

TSD File Inventory Index

Date: October 4, 1999

Initial: CMKlenhas

Facility Name: <u>Enbridge-Chem Corporation (One Folder Site)</u>			
Facility Identification Number: <u>IKID 084 259 951</u>			
A.1 General Correspondence	<input checked="" type="checkbox"/>	B.2 Permit Docket (B.1.2)	<input type="checkbox"/>
A.2 Part A / Interim Status	<input checked="" type="checkbox"/>	.1 Correspondence	<input type="checkbox"/>
.1 Correspondence	<input checked="" type="checkbox"/>	.2 All Other Permitting Documents (Not Part of the ARA)	<input type="checkbox"/>
.2 Notification and Acknowledgment	<input checked="" type="checkbox"/>	C.1 Compliance - (Inspection Reports)	<input type="checkbox"/>
.3 Part A Application and Amendments	<input checked="" type="checkbox"/>	C.2 Compliance/Enforcement	<input type="checkbox"/>
.4 Financial Insurance (Sudden, Non Sudden)	<input checked="" type="checkbox"/>	.1 Land Disposal Restriction Notifications	<input type="checkbox"/>
.5 Change Under Interim Status Requests	<input type="checkbox"/>	.2 Import/Export Notifications	<input type="checkbox"/>
.6 Annual and Biennial Reports	<input type="checkbox"/>	C.3 FOIA Exemptions - Non-Releasable Documents	<input type="checkbox"/>
A.3 Groundwater Monitoring	<input type="checkbox"/>	D.1 Corrective Action/Facility Assessment	<input checked="" type="checkbox"/>
.1 Correspondence	<input type="checkbox"/>	.1 RFA Correspondence	<input checked="" type="checkbox"/>
.2 Reports	<input type="checkbox"/>	.2 Background Reports, Supporting Docs and Studies	<input type="checkbox"/>
A.4 Closure/Post Closure	<input checked="" type="checkbox"/>	.3 State Prelim. Investigation Memos	<input type="checkbox"/>
.1 Correspondence	<input checked="" type="checkbox"/>	.4 RFA Reports	<input checked="" type="checkbox"/>
.2 Closure/Post Closure Plans, Certificates, etc	<input checked="" type="checkbox"/>	D. 2 Corrective Action/Facility Investigation	<input type="checkbox"/>
A.5 Ambient Air Monitoring	<input checked="" type="checkbox"/>	.1 RFI Correspondence	<input type="checkbox"/>
.1 Correspondence	<input type="checkbox"/>	.2 RFI Workplan	<input type="checkbox"/>
.2 Reports	<input type="checkbox"/>	.3 RFI Program Reports and Oversight	<input type="checkbox"/>
B.1 Administrative Record	<input type="checkbox"/>	.4 RFI Draft /Final Report	<input type="checkbox"/>

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		D.5 Corrective Action/Enforcement	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		E. Boilers and Industrial Furnaces (BIF)	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		F.1 Imagery/Special Studies (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		G.1 Risk Assessment	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual fields per schedule.*

BAKER & DANIELS
810 FLETCHER TRUST BUILDING
INDIANAPOLIS, INDIANA 46204-2454
317-636-4535

WASHINGTON OFFICE
SUITE 600 1920 N STREET N.W.
WASHINGTON, D.C. 20036
202-755-1565

March 16, 1983

Ms. Kathryn Brown
Freedom of Information Officer
United States Environmental
Protection Agency
Region V
230 South Dearborn
Chicago, IL 60604

Re: Freedom of Information Request

Dear Ms. Brown:

This request for documents is made pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and regulations promulgated thereunder by the United States Environmental Protection Agency (EPA), 40 C.F.R. §§ 2.100, et seq.

Explanatory Notes. As used herein:

a. "Landfill", "Northside", or "Northside Sanitary Landfill" means Northside Sanitary Landfill, Inc., Boone County, Indiana, and Jonathan W. Bankert d/b/a Northside Sanitary Landfill, Boone County, Indiana;

b. "Enviro-Chem" or "Environmental Conservation and Chemical Corporation" means the waste recycling and reclamation facility adjacent to the Northside Sanitary Landfill which is (or was) located on property in Boone County, Indiana, that is (or was) owned by Jonathan W. Bankert and his wife, Patricia A. Bankert; and

c. "Document" or "documents" mean EPA record as that term is defined in 40 C.F.R. § 2.100(b).

ALBERT BAKER
1874-1942

KARL J. STIPHER
JOHN D. COCHRAN
BYRON P. HOLLETT
DAN R. WINCHELL
EARL CLAY ULEN, JR.
RICHARD E. ALKMAN
J. B. KING
STEPHEN W. TERRY, JR.
THOMAS M. LOFTON
JOSEPH B. CARNEY
DANIEL E. JOHNSON
ROBERT L. JESSUP
VIRGIL L. BEELER
WILLIAM F. LANDERS, JR.
ROBERT N. DAVIES
RICHARD M. LEAGRE
THEODORE R. BOEHM
MICHAEL R. MAINE
PETER C. WARD
NORMAN P. ROWE
TERRILL D. ALBRIGHT
WILSON S. STOBBER
FRED E. SCHLEGEL
JAMES A. ASCHLEMAN
JERRY R. JENKINS
STEPHEN A. CLAFFEY
NORMAN G. TABLER, JR.
DAVID R. FRICK

EDWARD
1877-1940

RORY O'BRYAN
STEPHEN H. PAUL
CHARLES T. RICHARDSON
MICHAEL J. HUSTON
JAMES H. HEFFERNAN
LEWIS D. BECKWITH
DONALD P. BENNETT
THOMAS G. STANTON
JOE C. EMERSON
JAMES M. CARR
JAMES H. HAM III
MARY K. LISHER
DAVID N. SHANE
ROBERT D. SWHIER, JR.
GEORGE W. PENDYGRAFT
THEODORE J. ESPING
BRIAN K. BURKE
ROBERT W. ELZER
JOHN W. PURCELL
THOMAS A. VOGTNER
DAVID C. WORRELL
MARK B. BARNES
FRANCINA A. DLOUHY
JOHN E. POLLEY
STEVEN L. HOUSEHOLDER
J. DANIEL OGREN
TIBOR D. KLOPPER
HARRY F. McNAUGHT, JR.

JOSEPH DANIELS
1914-1972

GEORGE M. FLEWS
GEORGE W. SOMERS
ERIC T. FREYTOGLE
DAVID K. FREYTOGLE
RANDY D. LOSER
CHRISTOPHER G. SCANLON
MARK W. SCISCOE
JOHN B. SWARBRICK, JR.
ROBERTA SABIN RECKER
MICHAEL A. NARDOLILLI
JEFFERY B. RISINGER
ROBERT K. STANLEY
JOHN C. CAHALAN
MARTHA GRACE REESE
REBECCA A. RICHARDSON
IRENE T. ADAMCZYK
KEVIN D. BROWN
N. CLAY ROBBINS
GAYLE L. SKOLNIK
MARY M. STANLEY
BRENT D. TAYLOR
JOHN R. ZERKLE

* ADMITTED IN D.C. ONLY

PAUL N. ROWE
OF COUNSEL

Enviro Chem
IND 084 259 951

RECEIVED

MAR 22 1983

U.S. ENVIRONMENTAL PROTECTION AGENCY
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

We request:

1. (a) *Judy Stone* All documents relating to the interim authorization program submissions of 40 C.F.R. §§ 123.123(a)(1)-(a)(5) for the State of Indiana; and (b) all documents relating to the progress report of 40 C.F.R. § 123.131 submitted by the State of Indiana. *never rec'd*

2. (a) All documents relating to revisions of the Part A application filed by Northside Sanitary Landfill or Enviro-Chem with the EPA Region V Administrator pursuant to 40 C.F.R. § 122.22(c); and (b) all documents relating to studies or investigations by EPA to determine whether Northside or Enviro-Chem has treated, stored, or disposed of hazardous waste at facilities without interim status; and (c) all documents relating to studies or investigations by EPA to determine whether (i) Northside has treated, stored, or disposed of hazardous waste not reported on its Part A application, or revisions thereof, or (ii) Enviro-Chem has treated, stored, or disposed of hazardous waste not reported on its Part A application, or revisions thereof.

3. (a) All documents reflecting or tending to reflect the names of haulers or generators of wastes which have been treated, stored, or disposed at Northside Sanitary Landfill or at Enviro-Chem, the amounts of wastes received from these persons, and the amounts paid by these persons for treatment, storage, or disposal of wastes at Northside Sanitary Landfill or Enviro-Chem; and (b) all documents not otherwise provided in response to Request No. 3(a) which reflect or tend to reflect the amounts, types, nature and location of wastes treated, stored, or disposed at Northside Sanitary Landfill or Enviro-Chem.

4. All documents pertaining to the construction, operation, closure or expansion of Northside Sanitary Landfill or Enviro-Chem, to the effect of the Landfill or Enviro-Chem upon the environment, to the geologic suitability of the site of the facilities, to any sampling or testing done in the vicinity of the Landfill or Enviro-Chem, or to any installation of a leachate collection system at the Landfill, including but not limited to all such documents submitted by EPA to or obtained or received by EPA from (a) the Indiana Stream Pollution Control Board, any member of that Board, or any member of its staff; (b) the Indiana Environmental Management Board, any member of that Board, or any member of its staff; (c) the Indiana Department of Natural Resources, or any member of its staff; (d) the Indiana State Board of Health, or any member of its staff; (e) the Attorney General of Indiana, or any member of his staff; (f) the Indiana Solid Waste Facility Site Approval Authority, or any member of its staff; (g) the United States Department of Interior, Geological

Survey, or any member of its staff; (h) the United States Department of Agriculture, Soil Conservation Service, or any member of its staff; (i) Enviro-Chem (or any predecessor or successor corporation or receiver), its agents, employees, representatives, or Gary M. Watson; (j) Northside Sanitary Landfill (or any predecessor or successor corporation), its agents, employees, representatives or Jonathan W. Bankert; (k) the Indiana Heartland Coordinating Commission, any member of its staff or any of its agents or employees; and (l) any agent, employee, or contractor of EPA (such as CH₂M or Ecology and Environment, Inc.).

5. All documents submitted by EPA to or obtained or received by EPA from Alt & Witzig Engineering, Inc., ATEC Associates, Inc., Malcolm E. Aydt, P.E., Donald A. Cranor or Cranor Land Service, G.H. Dayhuff, R.P.S., or Technosolve, Inc., Roland P. Dove or Roland P. Dove and Associates, Brian Opel or Floyd Brown Associates, David M. Finton, Roy Strong, or Ronald Wukasch, in connection with the construction, operation or expansion of Northside Sanitary Landfill or Enviro-Chem, in connection with any effect of Northside Sanitary Landfill or Enviro-Chem upon the environment, or in connection with any sampling or testing done in the vicinity of Northside Sanitary Landfill or Enviro-Chem.

6.(a) All documents submitted by EPA to or obtained or received by EPA from Terry R. West or T.R. West & Associates in connection with (i) any construction, operation or expansion of Northside Sanitary Landfill or Enviro-Chem, or of the geologic suitability of the site of these facilities, (ii) any sampling or testing done in the vicinity of Northside Sanitary Landfill or Enviro-Chem, or (iii) any studies of the effect of Northside Sanitary Landfill or its operations or Enviro-Chem upon the environment; and (b) in this regard, all documents which reflect or tend to reflect (i) any oral communications between EPA and Terry R. West or T.R. West & Associates, and (ii) the substance of any EPA meeting with Terry R. West or any agent, representative or employee of T.R. West & Associates.

7. All documents submitted by EPA to or obtained or received by EPA from Donald L. Lush or Manager Beak Consultants Ltd. in connection with Northside Sanitary Landfill or Enviro-Chem including, but not limited to, (a) any sampling or testing done in the vicinity of Northside Sanitary Landfill or Enviro-Chem, or (b) any studies of the effect of Northside Sanitary Landfill or its operations or Enviro-Chem upon the environment.

8. All documents pertaining to the construction, operation or expansion of Northside Sanitary Landfill or Enviro-Chem or to any other matter involving Northside Sanitary

Landfill which were submitted to or obtained or received from (a) the law firm of Kunz & Kunz, Willis K. Kunz or Halbert A. Kunz; and (b) the law firm of Parr, Richey, Obremskey & Morton or Warren D. Krebs.

9. All documents submitted by EPA to or obtained or received by EPA from William E. Oatess or O.A. Laboratories, any member of its staff or any of its agents or employees, in connection with the operation of Northside Sanitary Landfill or with any sampling or testing done at or in the vicinity of Northside Sanitary Landfill or Enviro-Chem.

10.(a) All documents which were submitted to or received from the United States Department of Transportation by Northside Sanitary Landfill or Enviro-Chem since 1977 in connection with any transport of liquid or hazardous waste to Northside Sanitary Landfill or Enviro-Chem; and (b) all documents maintained or obtained or received by Northside Sanitary Landfill or Enviro-Chem pursuant to any rule or requirement of the United States Department of Transportation regarding liquid or hazardous waste.

11. All documents submitted by EPA to or received or obtained by EPA from Environmental Consultants, Inc., Clarksville, Indiana, in connection with (a) the operation of Northside Sanitary Landfill or Enviro-Chem; (b) any effect of Northside Sanitary Landfill or of Enviro-Chem upon the environment; or (c) any sampling or testing done in the vicinity of Northside Sanitary Landfill or Enviro-Chem.

12.(a) All documents submitted by EPA to or obtained or received by EPA from Howard, Needles, Tammen & Bergendoff, any member of its staff, or any of its agents or employees, in connection with the construction, operation or expansion of Northside Sanitary Landfill or Enviro-Chem or with any leachate collection system installed at Northside Sanitary Landfill; (b) all documents submitted by EPA to or obtained or received by EPA from Butler, Fairman and Seufert, any member of its staff or any of its agents or employees, in connection with the operation of Northside Sanitary Landfill or Enviro-Chem or any study of the costs of operation of Northside Sanitary Landfill or Enviro-Chem; and (c) all documents submitted by EPA to or obtained or received by EPA from Ronald J. Lofy, Richard D. Pomeroy or Pomeroy, Johnston and Bailey, Pasadena, California, any member of its staff, or any of its agents or employees in connection with Northside Sanitary Landfill or Enviro-Chem.

13. All documents submitted by EPA to or obtained or received by EPA that were maintained or prepared by Northside Sanitary Landfill or Enviro-Chem in connection with any rule

or requirement of (a) the Resource Conservation and Recovery Act, 42 U.S.C. § 6901, et seq., and any regulations promulgated pursuant thereto, including, but not limited to, documents recording the (i) detailed chemical and physical analyses of representative samples for each hazardous waste stream accepted for disposal by Northside Sanitary Landfill, (ii) the written waste analysis plan, (iii) the written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment, (iv) the written description for jobs relating to hazardous waste management; (v) training records on current personnel, (vi) the contingency plan, (vii) the written operating record, (viii) annual reports, (ix) unmanifested waste reports, (x) documents relating to groundwater contamination and monitoring data, (xi) closure plan, (xii) post-closure plan, and (xiii) all documents identifying the generators of such wastes accepted for disposal by Northside Sanitary Landfill, or (b) the Indiana Environmental Management Act, IC 13-7 et seq., and any regulations promulgated pursuant thereto.

14.(a) All manifests relating to solid or hazardous wastes transported to Northside Sanitary Landfill or Enviro-Chem; and (b) all documents recording the acceptance or receipt of wastes by Northside Sanitary Landfill or Enviro-Chem, including but not limited to (i) invoices, (ii) bills of lading, and (iii) shipping papers.

15. All documents pertaining to the construction, operation or expansion of Northside Sanitary Landfill, or the compliance of Northside Sanitary Landfill or Enviro-Chem with laws or regulations protecting the environment, which were submitted to or obtained or received from any elected official of the State of Indiana, from any member of the staff of the Governor of the State of Indiana, or from the Indiana Department of Commerce or any of their employees or staff persons.

16. All documents submitted by EPA to, or obtained or received by EPA in connection with compliance by Northside Sanitary Landfill, by Enviro-Chem, or by any real estate owned by Jonathan W. Bankert with the Comprehensive Environmental Response Compensation and Liability Act, 42 U.S.C. § 9601, et seq., or any rule or requirement promulgated pursuant thereto.

17.(a) All permits, licenses or approvals issued by EPA for the construction, operation or expansion of Northside Sanitary Landfill, for the discharge or emission of any pollutant from Northside Sanitary Landfill or Enviro-Chem, or

for the construction or operation of any pollution control device by the Landfill or Enviro-Chem; (b) all notices, warnings, orders, or determinations issued to Northside Sanitary Landfill or Enviro-Chem by EPA which relate to compliance with any federal law or regulation protecting the environment; and (c) all documents pertaining to whether any such permit, license, or approval could or should be issued.

18.(a) All documents setting forth any design or engineering plans for any leachate collection system installed at the Northside Sanitary Landfill; and (b) all documents recording: (i) dates upon which leachate is pumped from the leachate collection tanks at Northside Sanitary Landfill and the amount of leachate pumped from such tanks on those dates, (ii) the tanks from which such leachate is pumped, (iii) the location of the disposal of any such leachate, including the amount of any leachate pumped into the working face of Northside Sanitary Landfill, and (iv) the amounts of all liquid materials other than leachate disposed of in Northside Sanitary Landfill.

19. For each sample of well water (or groundwater), surface water, leachate, sediment or biological specimen taken or obtained by EPA in the vicinity of Northside Sanitary Landfill or Enviro-Chem, all documents: (a) showing the date and location from which the sample was taken; (b) used to record data relating in any way to the collection of the sample or the delivery of the sample to any person; (c) relating in any way to any chemical, biological, or physical tests made upon the sample; (d) relating to any testing methodologies used in the chemical, biological, or physical tests made upon the sample; (e) setting forth data or information obtained from or relating to any chemical, biological, or physical tests made on the sample; (f) containing calculations and analyses of data or information obtained from or relating to any chemical, biological, or physical tests made on the sample; and (g) containing any interpretation, analysis, or opinion regarding the meaning or significance of any data or information obtained from or relating to any chemical, biological, or physical tests made on the sample.

20.(a) All reports that relate to studies on the control or use of decomposition gases (such as methane gases) at Northside Sanitary Landfill; and (b) all documents that contain data or information resulting from or relating to any testing for gases (such as methane gases) posing an explosion or toxicity hazard at or in the vicinity of Northside Sanitary Landfill.

21. (a) All maps, diagrams, charts, figures, designs or blueprints outlining, depicting, picturing or showing the location of any groundwater monitoring or piezometer well at or in the vicinity of Northside Sanitary Landfill; and (b) all documents relating to the boring of such wells and/or the well logs relating to such wells.

22. All documents submitted to or obtained or received from persons regularly transporting, arranging for transport or disposing of hazardous wastes at the Landfill that reflect or tend to reflect Northside's intention to cease acceptance of hazardous waste after January 26, 1983.

23. (a) All documents submitted by EPA to or received or obtained by EPA from Ronald G. Blankenbaker, State Health Commissioner, Indiana State Board of Health, including but not limited to, all documents provided to Dr. Blankenbaker in response to the FOIA request dated October 8, 1982 (attached hereto as Exhibit A); and (b) all documents submitted by EPA to or received or obtained by EPA from Don Newman, the Director of the Washington Office for the State of Indiana.

24. All documents referred to in Appendix B (attached hereto as Exhibit B) to the draft report, "Remedial Action Master Plan (RAMP)", dated February 14, 1983, and prepared by CH₂M for EPA in connection with the Enviro-Chem site, including but not limited to the final RAMP report for the site, if available. (EPA is not requested to provide a copy of the draft RAMP referred to in this Request.)

25. All EPA notes and memoranda commenting upon or analyzing any information in any of the documents sought by any of these requests, including but not limited to all such documents submitted to or received or obtained by Hugh Kaufmann, an EPA employee in EPA's Office of Solid Waste and Emergency Response.

26. All documents that list or itemize documents submitted to all committees or subcommittees of either House of Congress in connection with Northside Sanitary Landfill or Enviro-Chem; and (b) all documents that list or itemize documents provided by EPA in response to this FOIA request.

We request that each of the above-numbered requests be treated severally, and only one copy of any document be provided. We further request that, in the event the search and copying fees for a numbered request should exceed \$20.00, we be advised so that we have an opportunity to take steps to minimize costs, if necessary. In the event any of these requests be denied or exceed the \$20.00 per request monetary

Ms. Kathryn Brown

-8

March 16, 1983

limit herein imposed, or the response thereto be delayed,
this should not preclude or delay timely production of any
of the other requests.

Respectfully submitted,

BAKER & DANIELS

By 
George W. Pendygraft

GWP/js

Enclosures

cc w/enc.: EPA Freedom of Information Officer



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5HS-JCK-13

9 AUG 1985

Mr. Steven K. Raymond
General Manager
Aetna Casualty & Surety
6081 East 82nd Street
Indianapolis, Indiana 46250

Re: Freedom of Information Act Request
RIN-501-85

This is in response to your Freedom of Information Act request received July 10, 1985, in which you asked for quantities and types of wastes, non-compliance, and bi-annual reports for the following facilities:

- a) Kaufmann Engineering, 701 Ransdale Road, Lebanon, Indiana;
- b) Enviro-Chem, 865 S. State Road 421, Zionsville, Indiana, United States Environmental Protection Agency (U.S. EPA) identification number IND084259951;
- c) Enbosograph Display Manufacturing Co., 1430 West Wrightwood Avenue, Chicago, Illinois, U.S. EPA identification number ILD005130471;
- d) Midco I, 7400 West 15th, Gary, Indiana, U.S. EPA identification number, IND980615621;
- e) Midco II;
- f) Emery Industries, 1300 Carew Tower, Cincinnati, Ohio, U.S. EPA identification number OHD093903235; and,
- g) West Freeman Field, Seymour, Indiana (Seymour Recycling, G Avenue West, Seymour, Indiana, U.S. EPA identification number IND040313017).

Per your conversation with Ms. Christine Klemme, of my staff, you agreed to a 10-day extension of time to compile the necessary materials. You further indicated that you required a computer printout of inspection and compliance actions against the facilities. You also indicated that you required information on two Gulf and Western Manufacturing Companies located at State Route 46 W, Greengburg, Indiana, U.S. EPA identification number IND052959640, and 1625 East Voorhees, Danville, Illinois, U.S. EPA identification number ILD065247355.

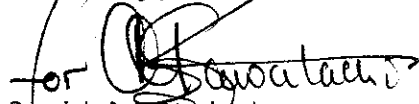
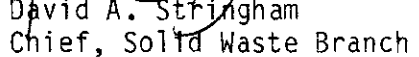
Attached please find a computer printout which lists those wastes generated by the above facilities, and compliance information for Enviro-Chem, Embosograph, Midco I, Emery, Seymour, and the Gulf and Western Manufacturing facilities. We have no Resource Conservation and Recovery Act (RCRA) information available in our files regarding Kaufmann Engineering and Midco II. Regarding your request for copies of all bi-annual RCRA reports for the above facilities, please note that RCRA biennial reports are compiled once every two years. Since the States of Illinois, Ohio and Indiana are authorized to perform their own surveys and inspections, please contact: Mr. Greg Zak, Illinois Environmental Protection Agency, 2200 Churchill Road, Springfield, Illinois 62706; Ms. Martha Gibbons, Ohio Environmental Protection Agency, P.O. Box 1049, 361 East Broad, Columbus, Ohio 43216; and, Mr. Guinn Doyle, Indiana State Board of Health, 1330 West Michigan Street, Indianapolis, Indiana 46206, for additional information.

Attached please find Comprehensive Environmental Response, Compensation Liability Act information concerning Kaufmann Engineering, and Emery Industries.

Also attached is a Bill for Collection on which the fees for this request have been itemized. Please return the top portion of the billing form with your check or money order in the amount of \$74.50, payable to the United States Environmental Protection Agency, and forward your remittance to the address on the billing form. Payment is due within 30 days.

Please contact Ms. Klemme, at (312) 886-3715, if you have any questions or require further assistance.

Sincerely,


for 
David A. Stringham
Chief, Solid Waste Branch

Attachments

cc: M. Gibbons, OEPA
G. Zak, IEPA
G. Doyle, ISBH
Facilities listed above

Attachments for RIN-501-85

EMERY INDUSTRIES

1. Freight Bill received 3/30, 1 page.
2. Freight Bill received 4/6, 1 page.
3. Freight Slip received 10-16-72, 1 page.
4. Freight Slip received 10/16/72, 1 page.
5. Solvent Reclamation Sales and Production Record, purchase order #009077, 1 page.
6. Solvent Reclamation Sales and Production, purchase order #009078, 1 page.
7. Dun and Bradstreet, #009079, 009080, 009081, 1 page.
8. Liquid Waste Removal Record-Hauler Report, 1 page.

ENVIRO-CHEM

1. Letter from A. Leder to A. Clark, dated 3-25-81, 1 page, with attached inspection report, 22 pages.
2. RCRA Inspection Report-Interim Status Standards, dated 3-19-81, 2 pages.
3. EPA Form 3510-1, dated 11-19-80, 2 pages, with map attached.
4. EPA Form 3510-3, dated 11-19-80, with maps, 9 pages.
5. RCRA Inspection Report, dated 3-4-81, 24 pages, with attached recovery, treatment, and disposal procedures.
6. Letter from David Finton to Rich Shandross, dated 5-15-81, 1 page.
7. Inspection Review form, 2 pages.
8. Letter from Oral Kent to Roy Strong, dated 12-11-78, 2 pages.
9. Letter from Wm. Miner to Gary Watson, dated 7-26-82, 2 pages.
10. (Memo)-Report on a Trip to Enviro-Chem on 5/20/80, dated 5-29-80, from G. Madany to C. Castle, 2 pages.
11. Memo notes from R. Shandross to H. Witschonke, dated 5-17-82, 2 pages.
12. Inspection Report Notes from 3-4-81, with listing of violations, and timetable of related actions, 7 pages.
13. Letter to Anne Gorsuch from Toby Moffat, regarding Enviro-Chem, dated 9-30-82, 2 pages.
14. Letter from R. Pickard to G. Watson, dated 8-27-82, 1 page.
15. Letter from R. Pickard to G. Watson dated 8-4-82, 2 pages.
16. Letter from R. Pickard to G. Watson dated 7-22-82, 1 page.
17. Letter from R. Pickard to G. Watson dated 7-23-82, 2 pages.
18. Letter from R. Pickard to G. Watson dated 7-30-82, 2 pages.
19. Letter from R. Pickard to G. Watson dated 6-28-82, 2 pages.
20. Letter from R. Pickard to G. Watson dated 6-18-82, 1 page.
21. Letter from R. Pickard to G. Watson dated 6-14-82, 2 pages.
22. Letter from R. Pickard to G. Watson dated 5-19-82, 2 pages.
23. Letter from R. Pickard to G. Watson dated 5-19-82, 2 pages.
24. Letter from G. Doyle to W. Weddle dated 5-14-82, 1 page.
25. Letter from R. Pickard to G. Watson dated 5-7-82, 2 pages.
26. Letter from R. Pickard to G. Watson dated 4-22-82, 3 pages.
27. Letter from R. Pickard to G. Watson dated 4-15-82, 1 page.
28. Letter from R. Pickard to G. Watson dated 4-8-82, 4 pages.
29. Letter from R. Pickard to G. Watson dated 2-10-82, 6 pages.
30. Letter from Commanding Officer to Mr. Strong, dated 1-15-82, 1 page.
31. Letter from R. Pickard to G. Watson, dated 1-12-82, 2 pages.
32. Letter from R. Pickard to G. Watson, dated 1-8-82, 2 pages.
33. Letter from R. Pickard to G. Watson, dated 12-31-81, 2 pages.
34. Letter from R. Pickard to G. Watson, dated 12-23-81, 2 pages.
35. Letter from R. Pickard to G. Watson, dated 12-10-81, 3 pages.

Attachments to RIN-501-85 (continued)

ENVIRO-CHEM

36. Letter from R. Pickard to G. Watson dated 12-7-81, 2 pages.
37. Letter from R. Pickard to G. Watson dated 12-1-81, 1 page.
38. Letter from R. Pickard to G. Watson dated 11-13-81, 2 pages.
39. Letter from R. Pickard to G. Watson dated 11-9-81, 2 pages.
40. Letter from R. Pickard to G. Watson dated 11-2-81, 2 pages.
41. Letter from R. Pickard to G. Watson dated 10-27-81, 1 page.
42. Letter from R. Pickard to G. Watson dated 10-20-81, 1 page.
43. Letter from R. Pickard to G. Watson dated 10-19-81, 2 pages.
44. Letter from R. Pickard to G. Watson dated 10-8-81, 2 pages.
45. Letter from R. Pickard to G. Watson dated 9-23-81, 2 pages.
46. Letter from R. Pickard to G. Watson dated 9-21-81, 2 pages.
47. Letter from R. Pickard to G. Watson dated 9-16-81, 2 pages.
48. Letter from R. Pickard to G. Watson dated 9-10-81, 2 pages.
49. Letter from G. Doyle to G. Watson dated 9-4-81, 1 page.
50. Letter from G. Doyle to G. Watson dated 8-31-81, 1 page.
51. Letter from R. Pickard to G. Watson dated 8-20-81, 1 page.
52. Letter from G. Doyle to R. Strong dated 8-13-81, 1 page.
53. Letter from R. Pickard to G. Watson dated 8-6-81, 2 pages.
54. Letter from R. Pickard to R. Strong, dated 7-6-81, 1 page.
55. Letter from R. Pickard to R. Strong, dated 6-24-81, 1 page.
56. Letter from R. Pickard to R. Strong, dated 6-18-81, 1 page.
57. Letter from R. Pickard to R. Strong, dated 6-11-81, 1 page.
58. Letter from R. Pickard to R. Strong, dated 5-14-81, 1 page.
59. Letter from R. Pickard to R. Strong, dated 5-8-81, 1 page.
60. Letter from R. Pickard to R. Strong dated 5-7-81, 2 pages.
61. Letter from Enviro-Chem (D. Fitch) to Karl Klepitsch, dated 4-2-81, 3 pages, with attached bulk tank inventory and aerial view map.

BOHN ALUMINUM (Gulf and Western), Greensburg, Indiana

1. Letter from Terry Gach to Lee Langlotz, dated 3-12-82, 2 pages.
2. Letter from R. Pickard to B. Smith dated 3-4-82, 2 pages.
3. Letter from Bob Smith to G. Doyle, dated 9-28-81, 2 pages.
4. Letter from R. Pickard to Bob Smith, dated 8-27-81, 2 pages.
5. RCRA Inspection Report dated 7-16-81, 24 pages.
6. Inspection and Enforcement Review/Status -2 pages.
7. File Audit Review Form, dated 11-16-82, 3 page.
8. Inspection Review Form, dated 1-22-82, 1 page.
9. ISS Inspection Review Sheet, dated 1-7-82, 1 page.

GULF AND WESTERN MANUFACTURING CO. (Chicago, Illinois)

1. Inspection and Enforcement Review -1 page.
2. Letter dated 1-17-83 from W. Miner to C.T. Corporation with attached consent agreement and final order, and Complaint, 12 pages.

EMBOSOGRAPH DISPLAY

1. Invoice dated 9-20-78, 1 page.
2. Stright Bill of Lading, signed 9-11-78, 1 page.
3. Order to Ship dated 9-11-78, 1 page.
4. Receiving Ticket and Material Report, dated 9-11-78, 1 page.
5. Invoice dated 6-27-78, 1 page.
6. Straight Bill of Lading, dated 6-15-78, 1 page.

Attachments for RIN 501-85 (continued)

EMBOSOGRAPH

7. Invoice dated 11-11-77, 1 page.
8. Pick-Up Ticket dated 11-9-77, 1 page.
9. Order to Ship dated 11-9-77, 1 page.
10. Order to Ship dated 3-21-77, 1 page.
11. Pick-Up Ticket, dated 3-21-77, 1 page.
12. Order to Ship, dated 6-30-75, 1 page.
13. Invoice dated 6-30-75, 1 page.

Additional EMERY INDUSTRIES information.

1. Letter from J. Hines to W. Reuger, dated 7-23-82, 2 pages.
2. RCRA Interim Status Inspection Form, dated 6-28-82, 16 pages.
3. Letter from P. Flanigan to W. Rueger, dated 9-9-81, 1 page.
4. Deficiency Notification Table-ISS Inspection, dated 8-28-81, 3 pages.
5. Treatment, Storage and Disposal Facilities Form A, dated 8-28-81, 24 pages.
6. EPA Form 3510-1, dated 11-18-80, 5 pages.
7. Inspection Review Form, dated 6-28-82, 2 pages.

**A.2 Part A/
Interim Status**

FORM 1 GENERAL		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:5%;">S</td> <td style="width:5%;">F</td> <td style="width:5%;">I</td> <td style="width:5%;">N</td> <td style="width:5%;">D</td> <td style="width:5%;">0</td> <td style="width:5%;">8</td> <td style="width:5%;">4</td> <td style="width:5%;">2</td> <td style="width:5%;">5</td> <td style="width:5%;">9</td> <td style="width:5%;">9</td> <td style="width:5%;">5</td> <td style="width:5%;">1</td> <td style="width:5%;">3</td> <td style="width:5%;">D</td> </tr> <tr> <td colspan="15"></td> </tr> </table>	S	F	I	N	D	0	8	4	2	5	9	9	5	1	3	D															
S	F	I	N	D	0	8	4	2	5	9	9	5	1	3	D																			
LABEL ITEMS II. EPA I.D. NUMBER III. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.																														

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		XX		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		XX	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		XX		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		XX	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	XX		XX	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		XX	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		XX		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		XX	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		XX		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		XX	

III. NAME OF FACILITY

1	SKIP	ENVIRO-CHEM CORPORATION
---	------	-------------------------

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 STRONG ROY PRESIDENT	3 1 7 7 6 9 6 1 5 3

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	B. CITY OR TOWN	C. STATE	D. ZIP CODE
3 8 6 5 S STATE ROAD 421	4 ZIONSVILLE	5 IN	6 4 6 0 7 7

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME	C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5 8 6 5 S STATE ROAD 421	7 BOONE	8 ZIONSVILLE	9 IN	0 4 6 0 7 7	1 01 1

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
C	7	7	3	9	9	(specify)	SOLVENT RECOVERY	C	7					(specify)					
15	16	17	18	19			15	16	17	18	19								
C. THIRD										D. FOURTH									
C	7					(specify)		C	7					(specify)					
15	16	17	18	19			15	16	17	18	19								

VIII. OPERATOR INFORMATION

A. NAME																									B. Is the name listed in Item VIII-A also the owner?									
C	8	E	N	V	I	R	O	-	C	H	E	M		C	O	R	P	O	R	A	T	I	O	N	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO								
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	66								
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																				D. PHONE (area code & no.)														
F = FEDERAL S = STATE P = PRIVATE										M = PUBLIC (other than federal or state) O = OTHER (specify)										P	(specify)	A	3	1	7	7	6	9	6	1	5	3		
																						15	16	17	18	19	20	21	22	23	24	25		
E. STREET OR P.O. BOX																																		
8 6 5 S S T A T E R O A D 4 2 1																																		
F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND																				
B Z I O N S V I L L E										I N		4 6 0 7 7		Is the facility located on Indian lands?																				
														<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO																				
														52																				

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
C	9	N								C	9	P							
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
C	9	U								C	9								
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
C	9	R								C	9								
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

Custom solvent reclamation, hazardous waste transportation, spill cleanup, lagoon and tank cleaning, chemical liquid and solid fuel production from wastes, research and development in chemical recovery.

F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
DAVID M. FINTON, V. PRESIDENT ROY STRONG - PRESIDENT	<i>[Signature]</i>	11-19-80

COMMENTS FOR OFFICIAL USE ONLY

C

JOEL E. BUCHARD, INDIANAPOLIS, IND.
JOHN H. FILER, BIRMINGHAM, ALA.
JUDG. GREGG, HONOLULU, HI.
MICHAEL G. OXLEY, OHIO

Handed up at request of Mr. Miller 8

NINETY-SEVENTH CONGRESS

7/30/82

Congress of the United States

House of Representatives

ENVIRONMENT, ENERGY, AND NATURAL RESOURCES
SUBCOMMITTEE

OF THE
COMMITTEE ON GOVERNMENT OPERATIONS
RAYBURN HOUSE OFFICE BUILDING, ROOM B-371-B-C
WASHINGTON, D.C. 20515

MAJORITY—225-627
MINORITY—225-2738

Advance copies

Gorsuch
Daniel
Lavelle
Modewitt
Gibben
Seales

September 30, 1982

The Honorable Anne M. Gorsuch
Administrator
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear Mrs. Gorsuch:

The Subcommittee on Environment, Energy and Natural Resources has a continuing interest in efforts to identify potentially dangerous hazardous waste sites and to prevent the environmental and human health damage often caused by them. Subcommittee member Floyd Fithian, who has a longstanding interest in effective hazardous waste regulation, has requested that the Subcommittee investigate the Enviro-Chem Inc. recycling facility and adjoining landfill in Zionsville, Indiana outside of Indianapolis.

That six-acre site contains over 20,000 55-gallon drums many of which are leaking industrial solvents, acids, caustics, paint sludges, thinners, and resins. Stored outdoors without protection from rain and stacked four and five high on porous soil and gravel, the site may pose a serious fire and explosion hazard. Additionally, those drums plus 47 bulk storage tanks filled with 270,000 gallons of liquid wastes and the landfill contents conceivably could threaten groundwater supplies and the Eagle Creek Reservoir, a major source of drinking water for Indianapolis' over one million residents. Notwithstanding, the owners of the site are currently proposing to expand that landfill.

It is the understanding of the Subcommittee that EPA inspected the site in March, 1981. Despite the apparently dangerous site conditions and the leaking drums, the resulting consent order of October 30, 1981 (Docket No. V-W-81-R-44A) does not require a major site cleanup and assessment of possible environmental damage. Rather, it was confined to a modest requirement that the owners improve their record-keeping.

To fully assess EPA's handling of that issue to date, the Subcommittee respectfully requests that you provide it with the following:

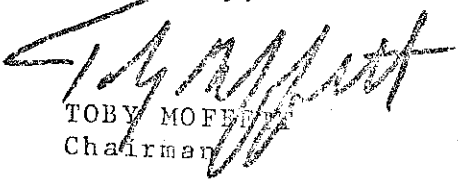
The Honorable Anne M. Gorsuch
September 30, 1982
Page Two

- all reports, analyses, memoranda or other documents in EPA's possession relating to the Zionsville site.

Those materials will be of help to the Subcommittee in its review of the site and the effectiveness of Resource Conservation and Recovery Act regulations and their implementation. I would appreciate your providing the documents by close of business on Thursday, October 7. If you have questions regarding this request, please contact D. Ann Murphy of the Subcommittee staff at 225-6427.

Thank you for your assistance in this matter.

Sincerely,



TOBY MOFFATT
Chairman

LIST OF ENCLOSURES

CONGRESSIONAL INQUIRIES

1 April 20, 1981	Letter from Douglas F. Johnstone to Attorney General Linley E. Pearson
2 July 19, 1982	Letter from Blankenbaker (ISBOH) to Hon. Mitchell V. Harper
3 September 13, 1982	Letter from Douglas F. Johnstone M.D. to Senator Richard G. Lugar
4 September 13, 1982	Letter from Douglas F. Johnstone M.D. to Representative Mitchell V. Harper
5 September 23, 1982	Letter from Buck to Lugar
6 September 24, 1982	Letter from Lugar to Anne Gorsuch
7 September 30, 1982	Letter from Toby Moffett to Anne M. Gorsuch
8 October 5, 1982	Letter from Susan Cook to Senator ^S Lugar and Quayle
9 October 8, 1982	Letter from Lugar to Val Adamkus
10 October 11, 1982	Letter from Quayle to Anne Gorsuch
11 November 5, 1982	Letter from Rita M. Lavelle to Honorable Toby Moffett (House of Representatives)
12 December 6, 1982	Letter from Rita M. Lavelle to Quayle
13 February 4, 1983	Letter from Rita M. Lavelle to Quayle

SUBJECT AND DATE			CONTROL NO.
DATE: 3-22-83			DATE REC'D
DUE DATE			3-22-83
REMARKS			ACKNOWLEDGMENT - 6/11/83 REMEDIAL RESPONSE - 4/1/83
REFERRED BY	(2)	(3)	(4)
✓ Site Management	Remedial Response	alvin 4/30/83	
DATE	3-22-83	DATE RELEASED	
REPLY SENT TO			
REMARKS			ACKNOWLEDGED - DATE
✓ Site Management - Provide information to Remedial Response			<input type="checkbox"/>
Part - Please update all Congressional inquiries and citizen inquiries on these sites for Dave - prepare response for my signature. Bill.			NO ANSWER NEEDED
Doc: Carol Kavcic			<input type="checkbox"/> (Explain in remarks)

EPA Form 5180-1 (6-72)
REPLACES FWPCA FORM 72 AND
NEW-73 WHICH MAY NOT BE USED.

(Remove this copy only, do not separate remainder.)

MAIL CONTROL SCHEDULE

1. Congressional Inquiries - A statement was made that EPA had received more inquiries from legislators on Northside/ECC than any other site in Region V. The attached list outlines the inquiries that we have copies of. If there are others, please advise.
2. RAMP/ECC - The recent controversy surrounding the release of the draft RAMP prepared by CH2M Hill underscores a very real problem. Obviously the document is draft, but the quality of that draft weighs heavily both on the contractor in terms of quality of work and the contracting agency in terms of the judicious use of taxpayers dollars. If the RAMP requires that much rewriting, the obviously we have an inexperienced contractor (regardless of whether you call it draft.)

Many of the mistakes developed in the ECC RAMP are also found in the Walker Oil RAMP. We request a serious review of their techniques, methodologies, and abilities be undertaken. The documents produced so far only cloud the State and EPA's ability to function effectively to mitigate problems as they arise.

RECEIVED

APR 11 1983

WASTE MANAGEMENT DIVISION
OFFICE OF THE REGIONAL DIRECTOR

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER															APPROVED		DATE RECEIVED (yr., mo., & day)									
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20							
F	I	N	D	0	8	4	2	5	9	9	5	1														

ENVIRO-CHEM CORP - CHEM

WST MAN ENRAC DIV 11-28-83 MGR

I. NAME OF INSTALLATION

~~ENVIRONMENTAL CONSERVATION & CHEMICAL CORP.~~

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

905 South State Road 421 N

CITY OR TOWN

Zionsville

ST.

IN

ZIP CODE

46077

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

905 South State Road 421 N

CITY OR TOWN

Zionsville

ST.

IN

ZIP CODE

46077

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

2 AUGUST OCHABAUER

PHONE NO. (area code & no.)

317-769-4484

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 JOHN BANKERT

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☒ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Enter "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION☒ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

I N D 0 8 4 2 5 9 9 5 1

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

FOR OFFICIAL USE ONLY															
S	W	I	N	D	0	8	4	2	5	9	9	5	1	F/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

*	1	2	3	4	5	6
	7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

- * ☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE (type or print)	DATE SIGNED
<i>James E. Koenig</i>	James E. Koenig Vice President - ENRAC	11/11/83

EPA Form 8700-12 (6-80) REVERSE

*NOTE: The facility is currently a clean-up site. Waste identification is unknown. Facility was originally operated as a solvent recovery facility.

P. e print or type in the unshaded areas only
(f. in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

205

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER									
			S I N D 0 8 4 2 5 9 9 5 1 T/A C 3 1									

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)		2. NEW FACILITY (Complete item below.)	
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)		<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)	
C 8 YR. 7 MO. 0 DAY 7 7 0 8 0 1 FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)		YR. MO. DAY 73 74 75 76 77 78 FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN	
B. REVISED APPLICATION (place an "X" below and complete Item I above)		2. FACILITY HAS A RCRA PERMIT	
<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS		<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT	

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	ACRE-FEET	A	
LITERS	L	TONS PER HOUR	HECTARE-METER	F	
CUBIC YARDS	Y	METRIC TONS PER HOUR	ACRES	B	
CUBIC METERS	C	GALLONS PER HOUR	HECTARES	Q	
GALLONS PER DAY	U	LITERS PER HOUR			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C D U P T/A C 3 1																			
B. PROCESS DESIGN CAPACITY																			
LINE NUMBER	A. PROCESS CODE (from list above)	1. AMOUNT (specify)					2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	1. AMOUNT					2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY		
		16	17	18	19	20					21	22	23	24	25			26	27
X-1	S 0 2	600					G		5										
X-2	T 0 3	20					E		6										
1	S 0 1	385,000					G		7										
	S 0 2	220,500					G		8										
3									9										
4									10										
16 - 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32										16 - 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32									

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS	P
TONS	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS	K
METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY											
S I N D 0 8 4 2 5 9 9 5 1 3 1													S W DUP 3 2 DUP											
V. DESCRIPTION OF HAZARDOUS WASTES (continued)													D. PROCESSES											
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))												
				27	28	29	30	31	32	33	34	35	36	37	38	39	40							
1	F 0 0 1	9600 000	T	N A	S 0	1	S 0	2							RECOVERY									
2	F 0 0 2	9600 000	T	N A	S 0	1	S 0	2							RECOVERY									
3	F 0 0 3	36240 000	T	N A	S 0	1	S 0	2							RECOVERY									
4	F 0 0 4	1920 000	T	N A	S 0	1	S 0	2							RECOVERY									
5	F 0 0 5	36240 000	T	N A	S 0	1	S 0	2							RECOVERY									
6	F 0 0 6	480 000	T	N A	S 0	1									RECOVERY									
7	F 0 1 7	480 000	T	N A	S 0	1	S 0	2							RECOVERY									
8	F 0 1 8	480 000	T	N A	S 0	1	S 0	2							RECOVERY									
9	K 0 7 8	480 000	T	N A	S 0	1	S 0	2							RECOVERY									
10	K 0 7 9	480 000	T	N A	S 0	1	S 0	2							RECOVERY									
11																								
12																								
13																								
14																								
15																								
16																								
17																								
18																								
19																								
20																								
21																								
22																								
23																								
24																								
25																								
26																								

IV. DESCRIPTION OF HAZARDOUS WASTES

(continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	I	N	D	0	8	4	2	5	9	9	5	1	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6: A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6: B/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

040 00 431

8 6 1 5 5 6 2

076 15 562

0 4 0 0 4 3 1

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	E	15	16	55	56	57	58	59	60	61	62	63
---	---	----	----	----	----	----	----	----	----	----	----	----

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	G	40	41	42	43	44	45
---	---	----	----	----	----	----	----

IX. OWNER CERTIFICATION

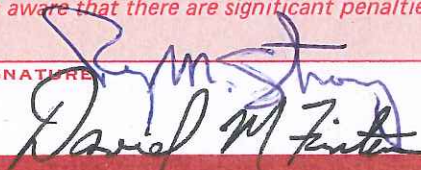
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

Roy Strong and/or David Finton



11-19-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

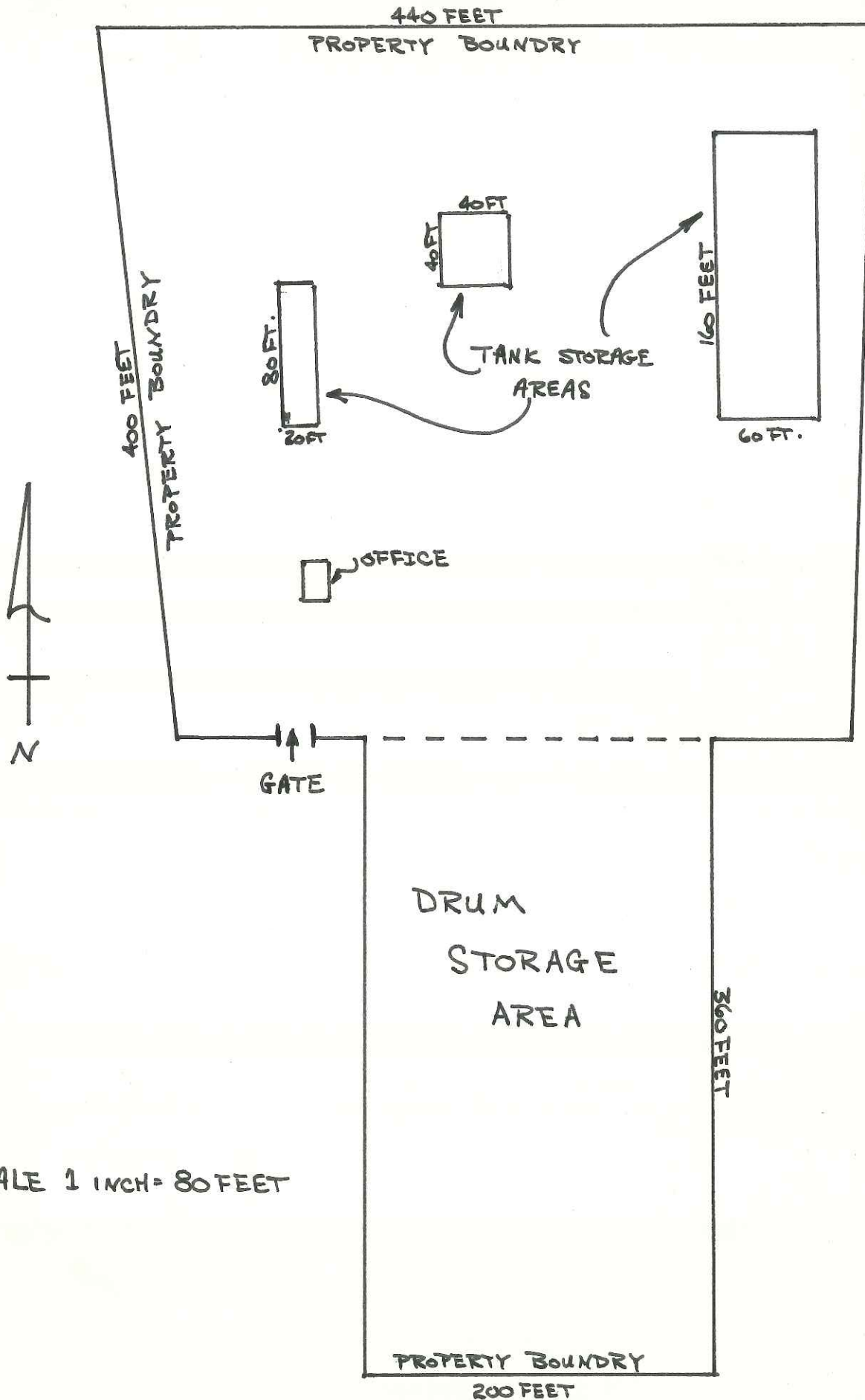
A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

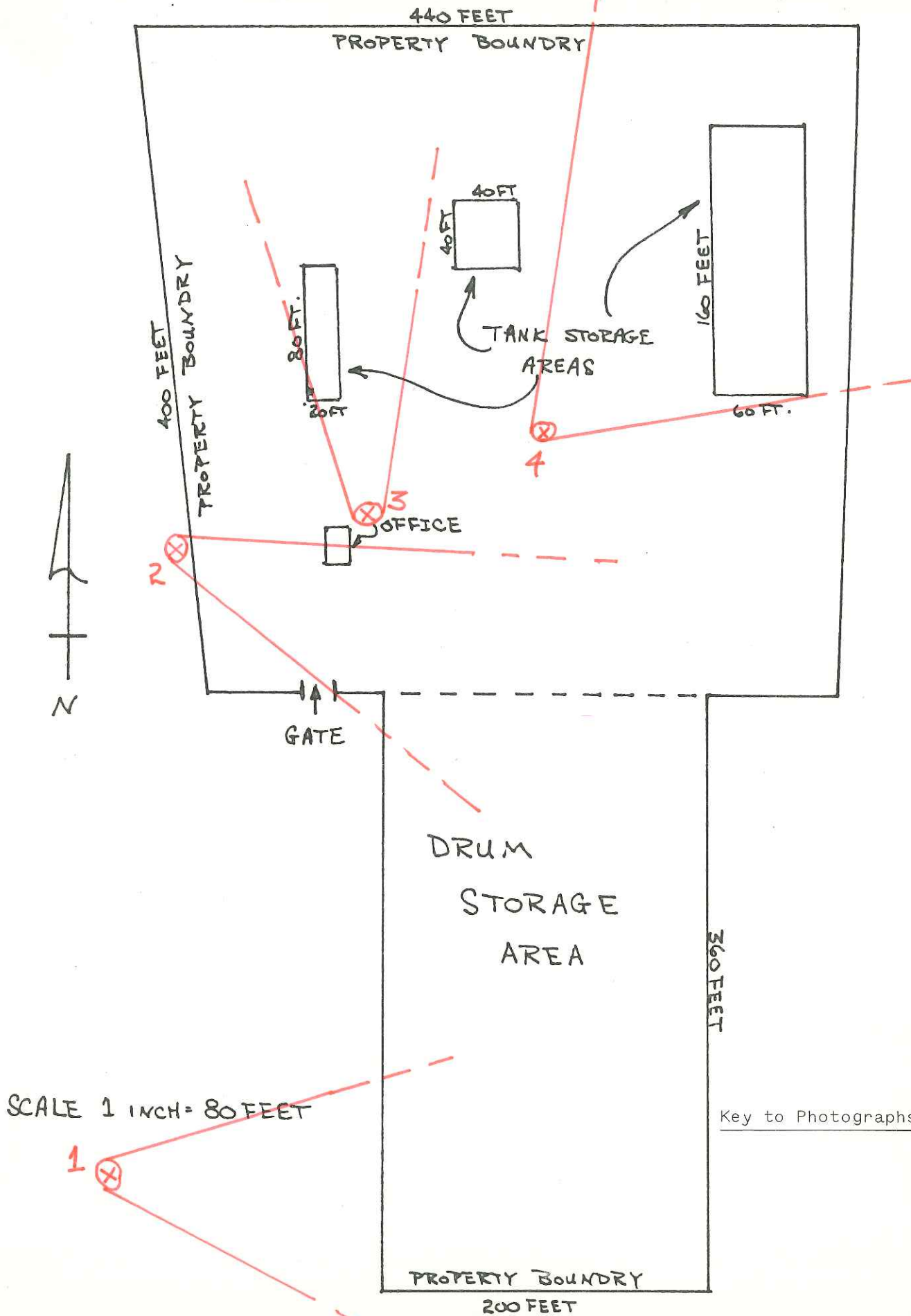
Roy Strong and/or David Finton

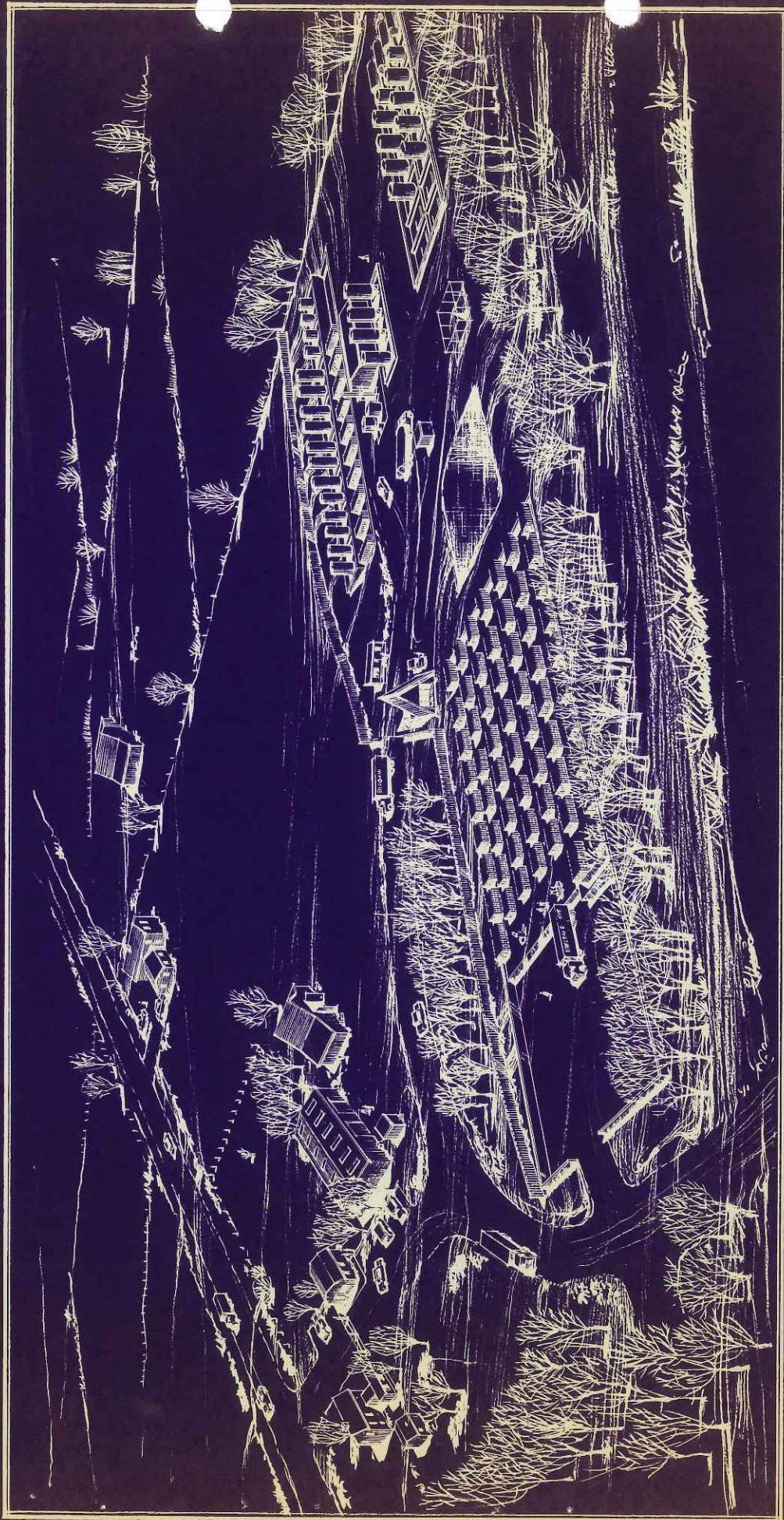
V. FACILITY DRAWING (see page 4)



SCALE 1 INCH = 80 FEET

FACILITY DRAWING (see page 4)



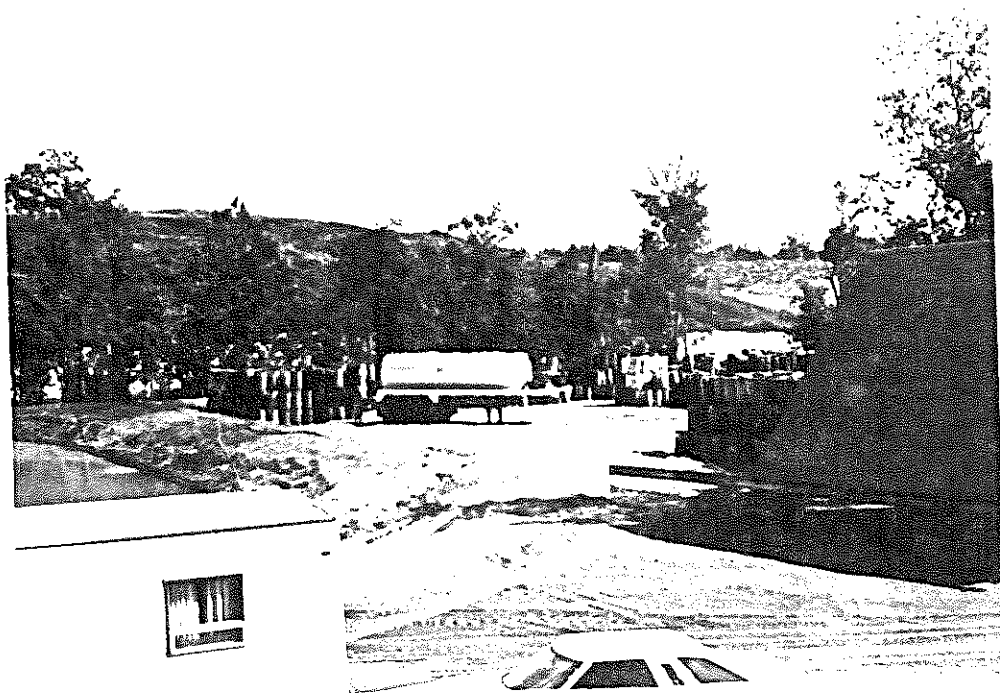


ENVIRO-CHEM CORPORATION ZIONSVILLE, INDIANA

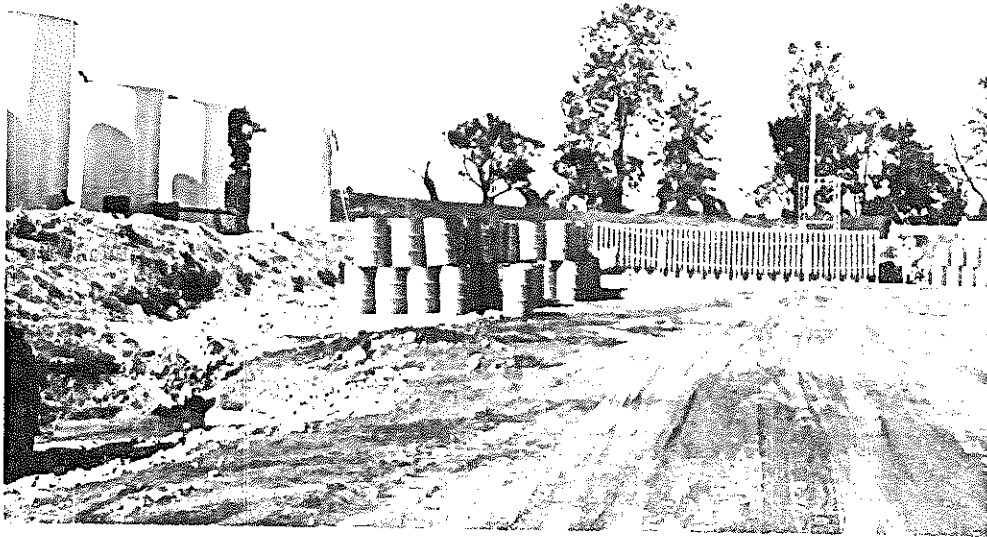
205



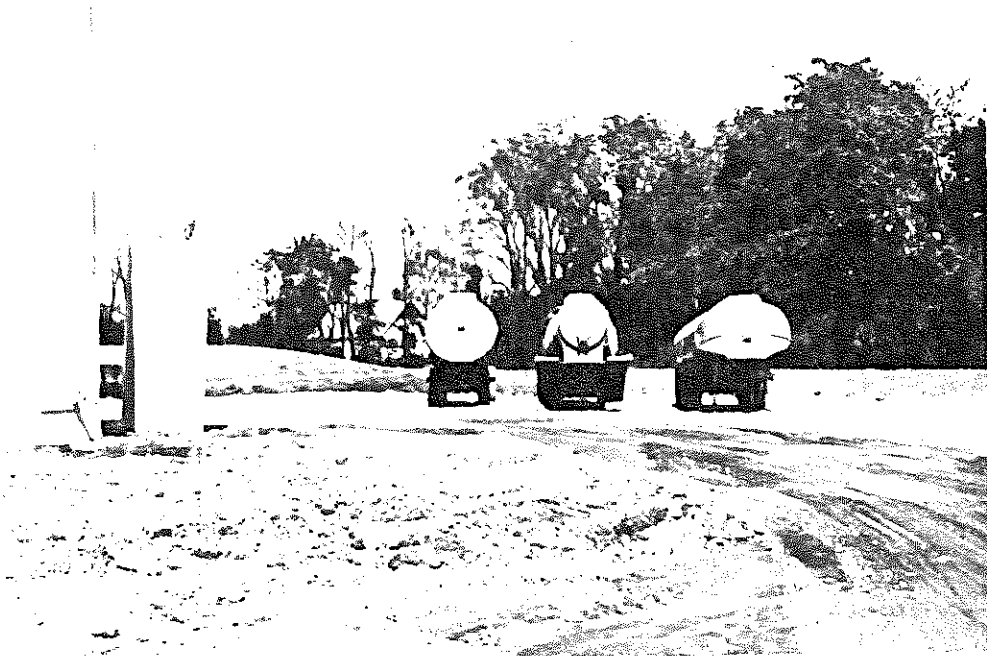
Photograph #1



Photograph #2



Photograph #3



Photograph #4

File in Part A



Chemical Waste
Management
Inc.

Name & Contact Changed 11-28-83, mfp

Chemical Waste Management, Inc.

3003 Butterfield Road
Oak Brook, Illinois 60521
312/654-8800

November 10, 1983

Mr. Y. J. Kim
U. S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

Dear Mr. Kim:

Enclosed is an amended "Notification of Hazardous Waste Activity" form for the Environmental Conservation and Chemical Company (ECC) in Zionsville, Indiana.

As you are aware, the contract for the clean-up and removal of waste off-site has been awarded to ENRAC, a division of Chemical Waste Management, Inc. As indicated on the attached form, ECC, the original operator of the facility, has been changed to ENRAC. See Item X, Certification.

As this should be considered simply a change in the operator of the facility, Chemical Waste Management, Inc. intends to operate using the ECC U.S.E.P.A. ID No. IND084259951. G, T, TSD,
PA

According to Richard Shandross of your staff, ECC also notified on the original form as the legal owner of the installation. It is our understanding the land owner is John Bankert.

Should you have any questions, please contact Judy Rosenbeck at 312/654-8800.

Sincerely,

James E. Koenig
Vice President
ENRAC

JKR/lr

Encl.

RECEIVED
NOV 15 1983
WASTE MANAGEMENT
BRANCH



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

FEB 10 1982

REPLY TO ATTENTION OF:

Mr. Roy Strong
President
Enviro-Chem Corporation
865 South State Road 421
Zionsville, IN 46077

RCRA ACTIVITIES

RE: Interim Status Acknowledgement USEPA ID No. IND084259951
FACILITY NAME: Enviro-Chem Corporation

Dear Mr. Strong:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

I.D. - FOR OFFICIAL USE ONLY															
5	W	I	N	D	O	8	4	2	5	9	9	5	1	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1 23 - 26	2 F 0 0 2 23 - 26	3 F 0 0 3 23 - 26	4 F 0 0 4 23 - 26	5 F 0 0 5 23 - 26	6 F 0 0 6 23 - 26
7 F 0 0 9 23 - 26	8 F 0 1 7 23 - 26	9 F 0 1 8 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 K 0 2 6 23 - 26	14 K 0 4 9 23 - 26	15 K 0 5 1 23 - 26	16 K 0 5 2 23 - 26	17 K 0 7 8 23 - 26	18 K 0 7 9 23 - 26
19 K 0 8 0 23 - 26	20 K 0 8 6 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26	32 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
-------------------	-------------------	-------------------	-------------------	-------------------	-------------------

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

DAVID M. FINTON
Vice President

7/18/80



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• IND084259951 REACKNOWLEDGEMENT

ENVIRO-CHEM CORPORATION
865 SOUTH STATE ROAD 421
ZIONSVILLE IN 46077

INSTALLATION ADDRESS

865 SOUTH STATE ROAD 421
ZIONSVILLE IN 46077

FACILITY NAME

ENVIRO-CHEM CORPORATION

EPA ID NUMBER

IND084259951

FACILITY OPERATOR

ENVIRO-CHEM CORP

FACILITY OWNER

ENVIRO-CHEM CORP

FACILITY LOCATION

865 SOUTH STATE ROAD 421
ZIONSVILLE IN 46077

PROCESS CODE -----	DESIGN CAPACITY -----	UNIT OF MEASURE -----
S01	385000.00000	G
S02	220500.00000	G

-----**KEY**-----

PROCESS -----	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE	* * UNIT OF * MEASURE	CODE
STORAGE:			* GALLONS	G
-----			* LITERS	L
CONTAINER	S01	G OR L	* CUBIC YARDS	Y
TANK	S02	G OR L	* CUBIC METERS	C
WASTE PILE	S03	Y OR C	* GALLONS PER DAY	U
SURFACE IMPOUNDMENT	S04	G OR L	* LITERS PER DAY	V
DISPOSAL:			* TONS PER HOUR	D
-----			* METRIC TONS\HOUR	W
INJECTION WELL	D79	G, L, U, OR V	* GALLONS\HOUR	E
LANDFILL	D80	A OR F	* LITERS\HOUR	H
LAND APPLICATION	D81	B OR Q	* ACRE-FEET	A
OCEAN DISPOSAL	D82	U OR V	* HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G OR L	* ACRES	B
TREATMENT:			* HECTARES	Q
-----			* POUNDS\HOUR	J
TANK	T01	U OR V	* KILOGRAMS\HOUR	R
SURFACE IMPOUNDMENT	T02	U OR V	* TONS PER DAY	N
INCINERATOR	T03	D, W, E, OR H	* METRIC TONS\DAY	S
OTHER	T04	J, R, N, S, U, V	*	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-JCK-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. EPA ID #: IND084259951

ENVIRO-CHEM CORP
865 S ST RD 421
ZIONSVILLE

IN 46077

RE: Hazardous Waste Permit Application

Dear Permit Applicant:

As you know, you have previously submitted Part A of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility. Timely submission of "the Part A" has allowed most hazardous waste management facilities to continue to operate under RCRA "interim status" (or the State program equivalent), while complying with applicable technical and record-keeping standards.

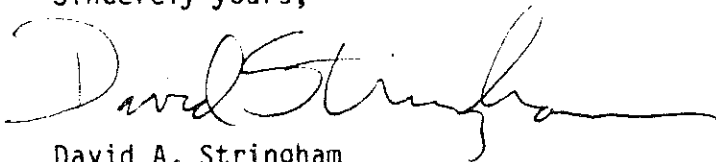
On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the 1984 Amendments) were enacted to modify RCRA. Under the 1984 Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. In addition, all interim status facilities are subject to corrective action requirements, regardless of whether they have 1) submitted a Part B application, 2) submitted a closure plan, 3) reverted to generator status only, 4) actually closed, or 5) none of these. Unless our Agency has formally terminated the facility's interim status, the corrective action requirements apply. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2 (or the State regulation equivalent).

We must determine whether releases of hazardous waste or hazardous waste constituents have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken or will be taken to eliminate threats to public health or the environment. An important element in our decision process is the information that you provide on the enclosed certification statement. Please read it carefully and either sign it and return it, or return it unsigned with a cover letter of explanation, within 45 days of the date of this letter. At some point in time, public input will be sought to either confirm or deny information you provide, or information we gather on our own, concerning releases and corrective actions.

..Please mail your response to the following:

RCRA Activities
Region V
P. O. Box A3587
Attention: ATKJG
Chicago, Illinois 60690

Sincerely yours,

A handwritten signature in cursive script, appearing to read "David Stringham".

David A. Stringham
Chief, Solid Waste Branch

Enclosure

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: _____
EPA I.D. NUMBER: _____
LOCATION CITY: _____
STATE: _____

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	<u>YES</u>	<u>NO</u>
• Landfill	_____	_____
• Surface Impoundment	_____	_____
• Land Farm	_____	_____
• Waste Pile	_____	_____
• Incinerator	_____	_____
• Storage Tank (Above Ground)	_____	_____
• Storage Tank (Underground)	_____	_____
• Container Storage Area	_____	_____
• Injection Wells	_____	_____
• Wastewater Treatment Units	_____	_____
• Transfer Stations	_____	_____
• Waste Recycling Operations	_____	_____
• Waste Treatment, Detoxification	_____	_____
• Other _____	_____	_____

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

— Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Typed Name and Title

Signature

Date



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

28 JUN 1982

Mr. Roy Strong
Enviro - Chem Corporation
865 S. State Road 421
Zionsville, Indiana 46077

RE: IND084259951
Enviro - Chem Corporation
Zionsville, Indiana

Dear Mr. Strong:

To facilitate the processing of hazardous waste permit applications, we are making two additional requirements concerning the format of these applications:

1. Please uniquely number each page of the application including all attachments (maps, specifications, etc.)
2. If you claim parts of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

If you have any questions, please call the person indicated in the Part B request letter. Thank you for your cooperation.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

FILE



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

Yellow
File

JAN 15 1982

REPLY TO ATTENTION OF:
SAHWM

Dr. Ronald G. Blankenbaker
State Health Commissioner
Indiana State Board of Health
1330 West Michigan
Indianapolis, Indiana 46206

Dear Dr. Blankenbaker:

During the next month, this office will begin requesting Part B of the Resource Conservation and Recovery Act, as amended (RCRA) permit applications for certain types of existing hazardous waste facilities. Excluded at this time are facilities whose operations include any of the following processes:

- a) D 79 - Injection Well
- b) D 80 - Landfill
- c) D 81 - Land Application
- d) D 82 - Ocean Disposal
- e) D 83, S 04 & T 02 - Surface Impoundment
- f) T 03 - Incinerator

Members of my staff have reviewed the list of environmentally significant sites which was prepared jointly by our agencies in June 1981. Facilities shown on the enclosure with this letter were selected from that list, as well as from confirmed Part A records of operations at other facilities. We will be happy to receive any recommendations you may have regarding additions or deletions to this listing. Since we are scheduled to begin sending letters to these facilities on January 29, 1982, please have your staff contact Richard Shandross, the State Implementation Officer for your State, by January 22, 1982, with your comments. Although Part B application documents will be due six months after the date of our request, we will be requesting that facilities submit completed components of their applications as soon as practical.

Task 2, Output 1 of the FY-82 Cooperative Arrangement with your agency provides for 12.44 work years of technical assistance from your staff to review Part B submittals. These resources will not only contribute to the review process, but will also serve to assist in identifying additional candidates for future call-in, and to establish procedures for concurrent processing toward joint or simultaneous issuance of permits by our agencies. As a fundamental portion of this plan, we will also develop the most advantageous use of our technical contractor to assist us both in the effort.

951

Please do not hesitate to call me, or Mr. Shandross, at (312) 886-0140, if you have any questions, or wish to discuss our initiation of the RCRA permit issuance process.

Sincerely yours,

Basil G. Constantelos
Acting Director
Waste Management Division

Enclosure

cc: Ralph C. Pickard
Indiana State Board of Health

David Lamm
Indiana State Board of Health

Guinn Doyle
Indiana State Board of Health

bcc: R. Shandross
C. Lewis
J. Stone

Other (Sort-of action)

DATE	1/13/82	1/13/82	1-13-82	1/13/82	1/13/82	1/14/82
TIME						
INITIALS						
DATE						

A.4 Closure/
Post-Closure

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

JUL 16 1982

Mr. Gary L. Watson
Attorney at Law
P.O. Box 110
Lebanon, IN 46052

IND084259951

Dear Mr. Watson:

Re: Enviro-Chem Closure Plan

This letter acknowledges receipt of the Closure Plan filed with the Boone County Circuit Court on June 4, 1982. The Closure Plan is hereby disapproved as submitted. This letter is to transmit the initial comments of the Division of Land Pollution Control on said Plan. It should be understood that the Closure Plan is not a static document, but will need revisions and modifications as a result of the review process and the circumstances surrounding the closure of Enviro-Chem. It may take many revisions to come up with a Closure Plan that is acceptable to the Environmental Management Board, the Boone County Circuit Court, and the U.S. Environmental Protection Agency.

The Indiana Environmental Management Board and the U.S. Environmental Protection Agency (EPA) have regulations specifically addressing the closure of a hazardous waste management facility. These regulations are applicable to the closure of Enviro-Chem, and must be complied with. Before commenting on the specifics of the Closure Plan submitted, the procedures for closure specified in 320 IAC 4-6 will be outlined.

Closure, for regulatory purposes, is the period between the last date that wastes are periodically received and the submittal of a certification of completion of closure in accordance with an approved Closure Plan. The regulations specify a performance standard for closure; namely, that the facility be closed in such a manner as to minimize post-closure environmental contamination, and that such closure should minimize the need for further maintenance. Additionally, when closure is completed, all facility equipment and structures must have been properly disposed of, or decontaminated by removing all hazardous waste and residues.

The owner or operator of a hazardous waste facility is to submit his Closure Plan to the Technical Secretary of the Indiana Environmental Management Board for approval. The Technical Secretary will modify, approve, or disapprove the plan within 90 days of receipt. A modified or

new plan must be submitted if the plan is not approved. The Technical Secretary will provide, through a newspaper notice, the opportunity for the public to submit written comments on the Plan. The Technical Secretary may hold a public hearing on the Closure Plan.

Within 90 days after approval of the Closure Plan, the owner or operator must treat all hazardous waste in storage or remove them from the site in accordance with the approved Closure Plan. The owner or operator must complete closure activities in accordance with the approved Closure Plan within six months after receiving the final volume of wastes. Under certain circumstances, the Technical Secretary may approve a longer closure period.

When closure is completed, the owner or operator must submit to the Technical Secretary certification by both the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved Closure Plan.

The requirements in this letter also apply with respect to the U.S. EPA, since the State of Indiana has not, as yet, received interim authorization. The U.S. EPA and the Indiana State Board of Health will work together closely to minimize overlap and duplication. However, the required submissions and approvals will be needed from both agencies.

The comments on the Closure Plan filed with the Boone County Circuit Court follow. The comments are arranged under headings provided by the required elements of a Closure Plan, as specified in the hazardous waste management regulations.

I. Description of How and When the Facility will be Closed
(265.112(a)(1))

The Closure Plan submitted only generally addresses this requirement with respect to drums and bulk materials on-site. The priorities for removal of wastes should be addressed. Priorities could be listed by:

1. type of material;
2. location within the facility (on vs. off the storage pad);
3. condition of container; and/or
4. any other suitable criteria.

II. Inventory of Wastes in Storage (265.112(a)(2))

The estimate of inventory should be much more detailed. The estimate of drum inventory should be broken down by type of material. The physical location(s) of each type of material within the facility

could also be indicated. The inventory should include wastes for which ECC is considered the generator. Such wastes include still bottoms, process residue, cooling water, contaminated rainwater, contaminated soil, sludge from the solidification area, empty drums, and drums which have lost any markings identifying the wastes and the generator. The amount and location of "unknown" wastes in containers should also be provided.

For bulk inventory, the type and amount of wastes in each of the tanks on-site should be indicated.

The type of wastes currently undergoing treatment should be supplied. Priorities for on-site treatment of wastes should be provided. Priorities could include the type of material, the condition of the container, and its location within the facility.

A list of generators with wastes on-site should be provided. This list should include for each generator:

1. the type of wastes on-site (including any analytical data);
2. the quantity of wastes on-site;
3. the number of containers;
4. the physical location of the wastes within the facility; and
5. the present condition of containers.

It is suggested that you contact these generators to ascertain their willingness to remove their wastes for proper management off-site. The services of ECC personnel need to be used to stage such wastes for removal, and could be compensated by the generator. It is suggested that generators with wastes needing off-site management (brokered wastes) be contacted first.

III. Decontamination of Facility Equipment (265.112(a)(3))

A list of facility equipment and structures needing decontamination should be prepared. The method of decontamination to be used for each type of equipment should be given. The disposition of any residues and contaminated liquids resulting from cleaning should also be described.

IV. Schedule for Final Closure (265.112(a)(4))

A tentative schedule for closure activities should be provided. This schedule should be integrated with the priorities set for removal of wastes and contaminated soil from on-site.

It is hoped that these comments on the preliminary closure plan for ECC will aid in subsequent revisions. Hopefully, the Closure Plan and Financial Assurance Plan can be finalized and approved so as to expedite the clean-up and closure of the site. Please modify the Closure Plan to incorporate these comments and resubmit the Plan by August 2, 1982. If you have any questions, please contact Mr. Gary F. Lindgren of the Division of Land Pollution Control at 317/633-0196.

Very truly yours,


Ralph C. Pickard
Technical Secretary

GFL/tw

cc: Mr. Phil Rarick, Deputy Attorney General
Mr. Richard Shandross, U.S. EPA ✓
Boone County Health Department

III. 2 6 1982

Mr. Gary Watson
Receiver
Environmental Conservation and
Chemical Corp.
P.O. Box 110
Lebanon, IN 46052

Judy

RE: Court Ordered Closure
Environmental Conservation and
Chemical Corp. (ECC)
USEPA ID#: IND084259951

Dear Mr. Watson:

On May 5, 1982, Boone Circuit Court Judge Ronald E. Drury ordered ECC to close and environmentally secure its site. The Order included requirements to cease receiving hazardous wastes and to submit a closure plan to the court.

Federal hazardous waste management regulations promulgated under the Resource Conservation and Recovery Act, as amended (RCRA), require owners and operators of hazardous waste facilities to submit a closure plan to the US Environmental Protection Agency (USEPA) within 15 days of issuance of a judicial decree to cease receiving wastes or close.

As no closure plan has been sent to USEPA, we find you to be in violation of 40 CFR §265.112(c)(2). Please submit a closure plan to this office by August 16, 1982. Also, be advised that ECC was required to provide to USEPA proof of financial assurance for closure by July 6, 1982, and proof of adequate liability insurance coverage by July 15, 1982. Please submit these documents if you have not already done so.

Until ECC is closed pursuant to 40 CFR 265 Subpart G, your Part B permit application remains due on August 18, 1982. You should be aware that failure to submit the Part B application on time is grounds for termination of interim status (see 40 CFR §122.22(a)).

Please contact Mr. Richard Shandross, at (312) 886-6146, if you have any questions on this matter.

Sincerely,

William H. Miner, Chief
Technical, Permits and Compliance Section

cc: Roy Strong, President
ECC

Phil Rarick
Indiana Attorney General's Office

Guinn Doyle
Indiana State Board of Health

bcc: Inspection file
Eric Dunham,
ORC

R. SHANDROSS:rita:5HW-TUB:7-23-82:6-7444

	TYPYST	AUTHOR	PEU CHIEF	STU #1 CHIEF	STU #2 CHIEF	TPS CHIEF	WMB CHIEF	AHMD DIRECTOR
INITIALS	<i>Rita</i>	<i>RS</i>	<i>X</i>	<i>X</i>	<i>X</i>	<i>X</i>	<i>X</i>	<i>X</i>
DATE	<i>7-23-82</i>	<i>7-23-82</i>		<i>7/23/82</i>		<i>7/26</i>		

Emr 7/26

**C.2 Compliance/
Enforcement**



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

February 23, 1988

VIA CERTIFIED MAIL P 652 575 486

Mr. Glen R. Howe
Director of Administration
Freightliner Corporation
4747 North Channel Avenue
P.O. Box 3849
Portland, Oregon 97208-3849

Re: Notice of Violation (V-163)
Freightliner Corporation
EPA I.D. No. IND 084259951

Dear Mr. Howe:

Based upon documents available to the Office of Solid and Hazardous Waste Management staff during a record review on August 24, 1987, and the results of a reinspection conducted on September 28, 1987, it has been determined that the closure plan for Freightliner Corporation, under the terms of the Notice of Violation (V-163) issued August 1, 1985, has not been completed.

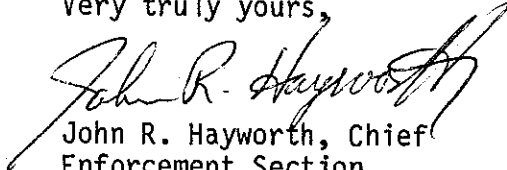
The paint storage area was still covered with what appeared to be dried paint residue (on asphalt). In the closure plan, decontamination of the area called for scarifying the asphalt surface. At the September 28, 1987, inspection, no evidence was present to indicate decontamination had taken place.

In order for Freightliner Corporation to achieve compliance, it will be necessary for you to decontaminate the paint storage area by scarifying the surface until all paint residues are removed. The above must be accomplished within thirty (35) days of your receipt of this correspondence.

Mr. Glen R. Howe
Page 2

Should you have any questions, please contact Mr. Charles Grady of this office at AC 317/232-3410.

Very truly yours,

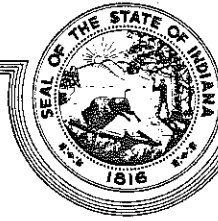
A handwritten signature in black ink, appearing to read "John R. Hayworth", with a stylized flourish at the end.

John R. Hayworth, Chief
Enforcement Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

CPG/mfw

cc: Marion County Health Department
Mr. Freeman Cook, Process Engineering Group, Inc.
Ms. Sally K. Swanson, U.S. EPA, Region V ✓
Mr. Charles Baker, Von Duprin, Inc.
Mr. James J. Mattes

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH
AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

RECEIVED August 1, 1985

AUG 5 1985

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

VIA CERTIFIED MAIL

Mr. Glen R. Howe
Director of Administration
Freightliner Corporation
4747 North Channel Avenue
P.O. Box 3849
Portland, OR 97208-3849

Dear Mr. Howe:

Re: RCRA Compliance Inspection
Freightliner Corporation
IND 084259951
Notice of Violation and
Information Request (V-163)

The Environmental Management Board is cooperating with the U.S. Environmental Protection Agency, Region V, in carrying out the provisions of the Resource Conservation and Recovery Act, Public Law 94-580 (RCRA). In this effort, representatives of the Environmental Management Board are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, treatment, storage, or disposal of hazardous waste. In addition to RCRA requirements, facilities are being inspected to determine compliance with Environmental Management Board 320 IAC 4, "Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements."

This letter is to inform you that on July 1, 1985, an inspection of Freightliner Corporation, located at 2720 Tobey Drive, Indianapolis, Indiana, was conducted by Messrs. David Koepper and Robert Malone of the Division of Land Pollution Control (Division), Indiana State Board of Health. Mr. Scott A. Smith of Ice, Miller, Donadio, and Ryan; Messrs. Geoffrey Langley and Bill Wisneski of Petrochem Services, Inc.; and you represented your firm at this inspection.

The following violations of RCRA and 320 IAC 4 pertaining to the operation of your facility were noted:

1. Pursuant to 320 IAC 4-4-1 (40 CFR 262.34(b)), a person who stores hazardous waste in excess of ninety (90) days is subject to the permit requirements of 40 CFR 270. Based on an investigation by the Division, the Respondent stored hazardous waste in excess of ninety (90) days and did not have a permit under 40 CFR 270 (interim status).
2. Pursuant to IC 13-7-4-1(h)(i), 320 IAC 4-8-2(a), and 320 IAC 4-9-1(a), no person shall commence construction of or engage in the operation of a hazardous waste facility without first obtaining a hazardous waste facility construction permit and operating permit, respectively. Based on an investigation by the Division, the Respondent has engaged in the construction and/or operation of a hazardous waste facility by storing hazardous waste F003 in a bulk storage tank and in two (2) small tanks in the paint touch-up area since February of 1983.
3. Pursuant to 320 IAC 4-7-1 (40 CFR 265.112(c)), the owner or operator of a hazardous waste facility must submit a closure plan to the Regional Administrator at least one hundred eighty (180) days before the date he expects to begin closure. Based on an investigation by the Division, Respondent began closure of the facility by removing the hazardous waste storage tank without submitting a formal RCRA closure plan to the Regional Administrator at least one hundred eighty (180) days in advance of the date closure began.
4. Pursuant to IC 13-7-4-1(a), no person shall discharge, emit, cause, allow, or threaten to discharge, emit, cause, or allow any contaminant or waste, including any noxious odor, either alone or in combination with other sources, into the environment or into any publicly owned treatment works in any form which causes or would cause pollution which violates or would violate regulations, standards, or discharge or emission requirements adopted by the Board. Based on an investigation by the Division, Respondent has discharged wastes from the hazardous waste storage area into the environment (parking lot and drainage ditch) which causes or would cause pollution in violation of the regulations.
5. Pursuant to 320 IAC 4-4-1 (40 CFR 262.11), a generator of a solid waste must determine if that waste is a hazardous waste. Based on information gathered by the Division, Respondent has not determined if the waste in the spill areas (parking lot and drainage ditch) and the liquid in the conveyor chain sump area (inside building) are hazardous wastes.

Freightliner Corporation, within thirty (30) calendar days of receipt of this letter, shall achieve compliance with the following requirements:

1. Submit a RCRA Part A application to:

U.S. EPA, Region V
RCRA Activities
P.O. Box 7861
Chicago, IL 60680

The Part A application shall address and include storage of hazardous waste in the bulk storage tank and the two (2) small tanks in the paint touch-up area. A copy of the Part A application shall also be submitted to the Technical Secretary of the Indiana Environmental Management Board.

2. Submit an approvable formal RCRA closure plan pursuant to 320 IAC 4-7 (40 CFR 265.110-40 CFR 265.115) for the bulk tank storage area and the tanks in the paint touch-up area.

Upon approval of the closure plan by the Division, the Respondent shall implement the closure plan as approved.

3. Submit a sampling, analysis, and cleanup plan for the hazardous waste drum storage area and adjacent spill areas.
4. Determine if the spillage in the drum storage area and the liquid in the conveyor chain sump area are hazardous wastes as defined in 40 CFR 261.

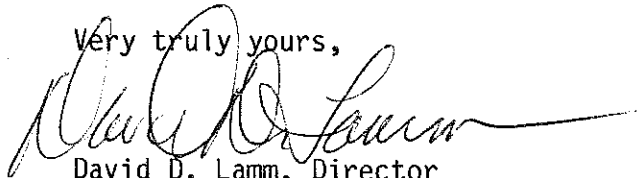
Your Company shall submit to this office, within thirty-five (35) calendar days of receipt of this letter, a written detailed explanation of the steps taken to achieve compliance. The letter shall state the date compliance was achieved.

The Division of Land Pollution Control also requests that Freightliner Corporation determine whether all hazardous wastes have been removed from the spray booth pits in the building. If the booths are determined to be free of hazardous wastes, this shall be certified by the corporation president. If the spray booth pits are determined to contain hazardous waste, formal RCRA closure of the pits will be required as specified in 320 IAC 4-7-1 (40 CFR 265.110 through 40 CFR 265.115). This information shall be submitted within thirty-five (35) calendar days of receipt of this letter.

Failure to respond adequately to this Notice of Violation and Information Request and verify a return to compliance at the facility will result in escalated enforcement action.

Please direct your response to this letter and any questions to Mr. Robert Malone of the Division of Land Pollution Control, Indiana State Board of Health, AC 317/243-5052.

Very truly yours,

A handwritten signature in dark ink, appearing to read "David D. Lamm", with a long, sweeping horizontal line extending to the right.

David D. Lamm, Director
Division of Land Pollution Control

RDM/tr

cc: Marion County Health Department

Ms. Sally K. Swanson, U.S. EPA, Region V

Mr. Scott Smith, Ice, Miller, Donadio & Ryan

Mr. David Koepper



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

RECEIVED
NOV 3 1988

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

October 27, 1988

Mr. Glenn R. Howe
Director of Administration
Freightliner Corporation
4747 North Channel Avenue
P.O. Box 3849
Portland, Oregon 97208-3849

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Re: Letter of Compliance (V-163)
Freightliner Corporation
EPA I.D. No. IND 084259951
Indianapolis, Marion County

Dear Mr. Howe:

Based upon documents available to the Office of Solid and Hazardous Waste Management staff during a record review on October 7, 1988, and the results of a reinspection conducted at your facility on May 6, 1988, it has been determined that Freightliner Corporation has achieved compliance with the terms of the Notice of Violation (V-163) issued to your firm on August 1, 1985.

This notice will also serve as verification that all conditions of the closure plan approved on January 10, 1986, and the subsequent certification dated August 24, 1987, are now valid.

Thank you for your cooperation. If you have any questions concerning this matter, feel free to contact Mr. Charles P. Grady of the Office of Solid and Hazardous Waste Management at AC 317/232-3410.

Sincerely,

Bruce H. Palin

Bruce H. Palin
Acting Assistant Commissioner for
Solid and Hazardous Waste Management

CPG/rmw

cc: Mr. Freeman Cook, Process Engineering Group, Inc.
Marion County Health Department
Ms. Sally K. Swanson, U.S. EPA, Region V
Ms. Jill Stevens

An Equal Opportunity Employer

MAR 08 1984

SMW

James E. Koenig, Vice President
Chemical Waste Management, Inc.
EMRAC Division
3003 Butterfield Road
Oak Brook, Illinois 60521

RE: Statement of Finding for Hazardous
Waste Treatment and Storage Approval
Enviro-Chem CERCLA Action
Honseltle, Indiana
ID 684258951

Dear Mr. Koenig:

My staff has reviewed the hazardous waste treatment and storage proposal you submitted to this Agency on February 6, 1984, and has concluded that this information satisfies all of the applicable technical requirements of the Resource Conservation and Recovery Act (RCRA).

As a matter of policy, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) fund-financed actions must comply with the technical requirements of other environmental laws, including RCRA. Accordingly, a Statement of Finding in lieu of a RCRA permit is hereby issued, effective immediately, for the above referenced site.

I hereby authorize Chemical Waste Management, Inc., EMRAC Division, to treat and store hazardous waste subject to the conditions delineated in the attached Statement of Finding.

Please contact Mr. Greg Weber of my staff at (312) 886-0891, if you have any questions regarding this authorization.

Sincerely,

Rasit G. Constantelos, Director
Waste Management Division

Enclosure

cc: Elaine Doyle, ISRW
Judy Rosenheck, Chemical Waste Management

bcc: Ken Burch
R. Shandross
H. Hindenberg

SRW/Weber:vc
DATE

TYPIST

AUTHOR

STU #1
CHIEF

STU #2
CHIEF

STU #3
CHIEF

TPS
CHIEF

WMB
CHIEF

WMD
DIRECTOR

INITIALS

DATE

Emm 3/2

3/5/84

Indy for CK
3-7-84
WMD

2/29/84

OW

3/1/84

3/2/84

3/5/84

3/7/84

3/7/84

STATEMENT OF FINDING

Issued To : Chemical Waste Management, Inc.
ENRAC Division
3003 Butterfield Road
Oak Brook, Illinois 60521

Site Location : Enviro-Chem IND084259951
865 South State Road 421
Zionsville, Indiana

Effective Date : On issuance

Expiration Date : September 30, 1984

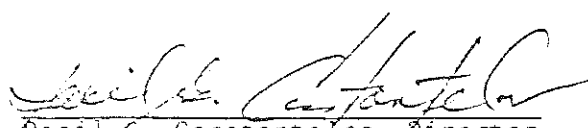
Purpose : To mitigate a threat to human health and
the environment caused by abandoned hazardous
waste at Enviro-Chem, 865 South State Road,
Zionsville, Indiana.

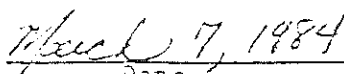
Actions Required : Treatment by mixing hazardous waste and
absorbent in a moveable tank to produce
a nonignitable, nonflowing solid with
no free liquids and storage of the
solidified treatment residue in a pile not to
exceed 200 cubic yards.

Wastes : F001-halogenated degreasing solvents and sludges
F002-halogenated solvents and still bottoms
F003-non-halogenated solvents and still bottoms
F004-non-halogenated solvents and still bottoms
F005-non-halogenated solvents and still bottoms
F006-wastewater treatment sludges
D001-Ignitable wastes

Conditions of Approval

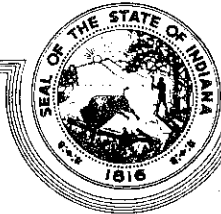
- | | |
|----------------------------------|--|
| 1. 40 CFR 264.4 | Imminent Hazard Action |
| 2. 40 CFR 264.12(c) | Required Notices |
| 3. 40 CFR 264.13(a)(1) & (2) | Waste Analysis |
| 4. 40 CFR 264.14 | Security |
| 5. 40 CFR 264.15(a) & (c) | Inspection Requirements |
| 6. 40 CFR 264.194(a)(3)(4) & (5) | Inspections (Tanks) |
| 7. 40 CFR 264.254 | Monitoring and Inspection (Waste Piles) |
| 8. 40 CFR 264.17 | General Requirements for Ignitable,
Reactive and Incompatible Waste |
| 9. 40 CFR 264.198(a) | Special Requirements for Ignitable
or Reactive Waste (Tanks) |
| 10. 40 CFR 264.256 | Special Requirements for Ignitable
or Reactive Waste (Waste Pile) |
| 11. 40 CFR 264.31 | Design and Operation of Facility |
| 12. 40 CFR 264.32(c) | Required Equipment |
| 13. 40 CFR 264.33 | Testing and Maintenance of Equipment |
| 14. 40 CFR 264.55 | Emergency Coordinator |
| 15. 40 CFR 264.56 | Emergency Procedures |
| 16. 40 CFR 264.73(a) & (b)(1) | Operating Record |
| 17. 40 CFR 264.74(a) | Availability, Retention, and Disposition
of Records |
| 18. 40 CFR 264.77 | Additional Reports |
| 19. 40 CFR 264.111 | Closure Performance Standard |
| 20. 40 CFR 264.114 | Disposal or Decontamination of Equipment |
| 21. 40 CFR 264.192 | General Operating Requirements |
| 22. 40 CFR 264.250(c) | Applicability |
| 23. 40 CFR 264.257 | Special Requirements for Incompatible
Wastes |
| 24. 40 CFR 264.258(a) | Closure |


Basil G. Constantinos, Director
Waste Management Division


Date

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS 46206-1964

1330 West Michigan Street
P. O. Box 1964

Mr. James E. Markle
Wastex Research, Inc.
2000 Broadway
East St. Louis, IL 62205

JUN 07 1983

Dear Mr. Markle:

Re: Environmental Conservation
Chemical Corporation
Process Equipment


This letter is in reference to your correspondence of April 11, 1983, concerning dismantling and transporting process equipment from the Environmental Conservation and Chemical Corporation.

Staff is unaware of any prior efforts to remove residuals and subsequently decontaminate the above-referenced process equipment. Since your statement that equipment is not contaminated was not substantiated with any historical or technical data, staff must take the position that the equipment may contain substantial amounts of residuals.

Prior to dismantling any equipment, Wastex Research, Inc., shall submit a decontamination plan which includes a detailed equipment removal narrative and have it approved by the Environmental Management Board. The plan should also address the disposal of all residuals from the decontamination of the equipment.

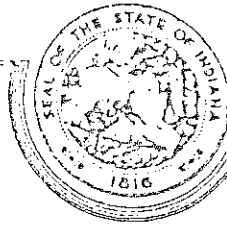
If you have any additional questions concerning this matter, please contact Mr. Guinn Doyle of the Hazardous Waste Management Branch at AC 317/633-0198.

Very truly yours,


Ralph C. Pickard
Technical Secretary

SKW/jb

cc: Mr. Phillip Rarick, Deputy Attorney General
Mr. Rich Shandross, U.S. EPA ✓



STATE BOARD OF HEALTH
AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206

8 October 1982

CERTIFIED MAIL

Mr. Hugh Kaufman
Hazardous Site Control Division
Office of Solid Waste
U.S. Environmental Protection Agency
401 M Street
Washington, DC 20460

Dear Mr. Kaufman:

Re: Request for Information Pursuant to
5 USC Section 552 and 40 CFR Part 2

Recently you have made a number of statements concerning the Northside Landfill and the Enviro-Chem facility near Zionsville, Indiana. These statements have indicated that you have data which allow you to state that a residential well was contaminated by the Northside Landfill instead of Enviro-Chem and that people in your office consider Indiana to be one of the worst states at enforcing hazardous waste rules. Other of your comments have implied that you believe these two facilities represent a significant if not imminent threat to the public health.

To this date you have not seen fit to provide the lead agency of the State of Indiana, the Indiana State Board of Health, with the documentation which supports these allegations; and the agency for which you work, the Environmental Protection Agency (EPA), denies the existence of such documentation or that you represent the EPA when making such comments. Therefore, pursuant to the Freedom of Information Act and regulations promulgated to implement the Act, I am requesting the following:

1. All letters, correspondence, memoranda, reports, studies, and any other written documentation which your office has and which form the basis for your statements concerning both Northside Landfill's and Enviro-Chem's impact on the environment.

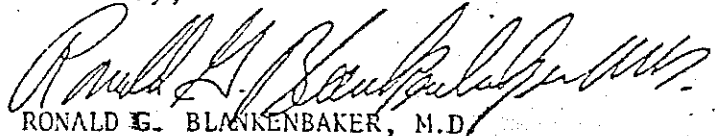
Mr. Hugh Kaufman

8 October 1982

2. All letters, correspondence, memoranda, reports, and studies which your office has which relate to, refer to, or concern the enforcement of state and/or federal hazardous waste laws and regulations by the State of Indiana.
3. All letters, correspondence (verbal and written), and memoranda to anyone outside your agency (state or federal employee, public or private agency, representatives of the news media, etc.) in which you have conveyed or expressed your opinions of the environmental impact of both Enviro-Chem and the Northside Landfill and/or the capability of the State of Indiana to deal with that impact.
4. All letters, correspondence, and memoranda from you and/or your office which concern, direct, or recommend federal involvement pursuant to CERCLA (P.L. 96-510) and/or Section 7003 of RCRA (P.L. 94-580), with either Enviro-Chem or Northside Landfill.

Your prompt consideration of this request is expected. We must demand any information which indicates a threat to the public health of the citizens of Indiana!

Sincerely,



RONALD G. BLANKENBAKER, M.D.
STATE HEALTH COMMISSIONER
INDIANA STATE BOARD OF HEALTH

cc: Ms. Anne Gorsuch
Mr. Valdas Adamkus
Hon. Robert D. Orr
Hon. Richard G. Lugar
Hon. Linley E. Pearson
WTHR - Channel 13

APPENDIX B
SITE CHRONOLOGY

INTRODUCTION

The following site chronology is intended to serve as a general summary and order of events of known activities at or concerning the site. It is a date-by-date compilation of information obtained by reviewing CH2M HILL files containing available correspondence, reports and documents pertinent to the site. For cross reference purposes, each entry has been labeled with a document number. This number reflects its source of origin in the CH2M HILL files. In addition, each entry has been assigned a key word to quickly characterize the type of event discussed in the entry.

CHRONOLOGY FILE

Date: 05/05/77
Document No.: 0040
Key Word: Legal Action
Description: APCD issues a permit "to construct a solvent recovery facility," namely ECC.

Date: 08/00/77
Document No.: 0010
Key Word: Site Data
Description: ECC begins operation as a waste storage and recycling business in Boone County, 865 South U.S. 421, Zionsville, IN.

Date: 12/15/77
Document No.: 0153
Key Word: Site Data
Description: ECC requests approval to dispose of 5,000 gallons per month of wastewater (from an oil reclamation process) at the Northside Sanitary Landfill. Construction on this project was completed in March 1978; however, their request for disposal was denied on April 11, 1978.

Date: 01/22/79
Document No.: 0062
Key Word: Site Visits
Description: ISBH personnel conduct an inspection of ECC to review the company's waste treatment facilities. Inspection was conducted in response to the company's proposed land application of oil treated wastewater.

Date: 03/23/79
Document No.: 0025

<u>Key Word:</u>	Site Data
<u>Description:</u>	SPCB receives plans and specifications for wastewater treatment facilities at ECC.
<u>Date:</u>	04/17/79
<u>Document No.:</u>	0040
<u>Key Word:</u>	Legal Action
<u>Description:</u>	SPCB staff orders that a hearing be scheduled to resolve issues around SPC-17 reporting violations made by ECC.
<u>Date:</u>	05/30/79
<u>Document No.:</u>	0032
<u>Key Word:</u>	Legal Action
<u>Description:</u>	SPCB files a Notice of Hearing and Complaint against ECC in regards to violations of SPC 17. ECC was ordered to submit accurate monthly hauling and receiving reports in accordance with the regulation and was fined \$400.
<u>Date:</u>	06/20/79
<u>Document No.:</u>	0061
<u>Key Word:</u>	Legal Action
<u>Description:</u>	J. Reynolds (SWMS) submits to S. Zlatos (OAG) a list of actions believed sufficient to prove ECC's intent to improve its operation and abide by regulations.
<u>Date:</u>	07/03/79
<u>Document No.:</u>	0025
<u>Key Word:</u>	Legal Action
<u>Description:</u>	SPCB offers no objection to wastewater treatment facilities at ECC as proposed to them in plans and specifications received March 23, 1979. The proposed system was to have been a "closed" system without net excess wastewater discharge.
<u>Date:</u>	07/31/79
<u>Document No.:</u>	0027
<u>Key Word:</u>	Site Data
<u>Description:</u>	T. Berger, private citizen, reports an oil slick on Eagle Creek, north of Zionsville, to the ISBH. Immediate investigation revealed that the oil (waste oil) had originated from ECC and a minor amount from the Northside Sanitary Landfill. ECC agreed to take action to recover the oil.

Date: 08/02/79
Document No.: 0028
Key Word: Site Data
Description: While conducting a followup investigation of the 7/31/79 oil spill, D. Shipe (ISBH) discovered that ECC intentionally discharged process and cooling water from a storage pond to Finley Creek. Water samples and photographs were taken. Shipe suggested that enforcement action was warranted for failure to have a NPDES permit and for violations of SPC 16 and SPC IR-4.

Date: 11/30/79
Document No.: 0036
Key Word: Site Data
Description: ECC submits its Spill Prevention Control and Countermeasure Plan.

Date: 12/00/79
Document No.: 0037
Key Word: Site Data
Description: EPA designates ECC as a potential hazardous waste site.

Date: 12/10/79
Document No.: 0038
Key Word: Sampling/Testing
Description: J. R. Gammon (Prof. of Zoology, DePauw Univ.) contacts O. Hert (SPCB) in regards to the condition of Finley Creek explaining that he has been monitoring aquatic communities at a station immediately downstream of the landfill as part of a study on Eagle Creek Watershed. Gammon says that the lack of low diversity, and low population of aquatic life he observed at this station gives indication of severe pollution and believes that seepage and/or runoff from the dump is responsible.

Date: 01/03/80
Document No.: 0039
Key Word: Site Data
Description: O. Hert (SPCB) grants ECC permission to dispose of 2,000 cu. yds. of oil and paint contaminated soil at Northside Sanitary Landfill on a one time only basis.

<u>Date:</u>	02/04/80
<u>Document No.:</u>	0035
<u>Key Word:</u>	Sampling/Testing
<u>Description:</u>	ISBH Water Laboratory reports results of SWMS's 11/2/79 water sampling at ECC. Relatively high concentrations of arsenic, cadmium, chromium, lead, nickel, oil and grease, phenol, and zinc were detected in pond samples.
 <u>Date:</u>	 02/13/80
<u>Document No.:</u>	0040
<u>Key Word:</u>	Legal Action
<u>Description:</u>	SWMS is notified by the Industrial Hygiene and Radiological Health Division that they had received complaints of violations of OSHA regulations and hazardous working conditions at ECC.
 <u>Date:</u>	 03/12/80
<u>Document No.:</u>	0043
<u>Key Word:</u>	Site Visits
<u>Description:</u>	R. A. Shandross and R. Karl (SWMS) and U.S. EPA personnel along with ECC management personnel participate in an investigation of ECC to gather information on site conditions and operations with respect to hazardous waste management, for the purpose of evaluation of potential hazards to the environment and/or health.
 <u>Date:</u>	 04/03/80
<u>Document No.:</u>	0045
<u>Key Word:</u>	Sampling/Testing
<u>Description:</u>	SWMS conducts water sampling of discharge from south drum storage area of ECC.
 <u>Date:</u>	 04/10/80
<u>Document No.:</u>	0043
<u>Key Word:</u>	Site Visit
<u>Description:</u>	U.S. EPA personnel conduct a reconnaissance inspection of the site including an assessment of the potential for spills, runoff and fires. Samples were collected at 7 locations on the site.
 <u>Date:</u>	 04/17/80
<u>Document No.:</u>	0153
<u>Key Word:</u>	Legal Action
<u>Description:</u>	Staff from the Bureau of Engineering of

the ISBH document ECC violations of the Environmental Management Act, the Air Pollution Control Law, the Stream Pollution Control Law, and Regulations promulgated under these laws.

Date: 05/20/80
Document No.: 0055
Key Word: Site Visits
Description: U.S. EPA visits ECC to investigate whether the facility is in violation of the Clean Water Act of 1977 (CWA) P.L. 95-217 Section 311.

Date: 06/02/80
Document No.: 0056
Key Word: Legal Action
Description: ECC requests the opportunity to have the EMB or some of its members visit the facility on July 11, 1980, to see for themselves that they are making the necessary improvements. This was done in reaction to the EMB action against ECC in hopes of reaching an out-of-court agreement with the board.

Date: 09/05/80
Document No.: 0071
Key Word: Sampling/Testing
Description: SWMS conducts water quality study sampling of private wells in the vicinity of ECC.

Date: 09/08/80
Document No.: 0065
Key Word: Legal Action
Description: G. H. Madany (EPA) documents remedial actions to be taken by ECC to eliminate leachate problems at the site. Madany requested ECC submit a plan of action within 45 days.

Date: 02/09/81
Document No.: 0101
Key Word: Site Data
Description: ECC employee dies of exposure to toxic vapors after entering a solvent tanker.

Date: 02/12/81
Document No.: 0077
Key Word: Community Relations
Description: The Reporter prints "Enviro-Chem Puts No Blame on Accident But Cites Possible

Fallacies."

Date: 02/28/81
Document No.: 0082
Key Word: Community Relations
Description: The Star prints "Two Streams Near
Zionsville to be Tested for Pollutants."

Date: 03/04/81
Document No.: 0089
Key Word: Site Visits
Description: U.S. EPA conducts site inspection and
files RCRA Inspection Report - Interim
Status Standards; Treatment, Storage,
and disposal facilities.

Date: 03/05/81
Document No.: 0096
Key Word: Site Data
Description: ISBH meets with representatives of
several municipal agencies and the
Indianapolis Water Company to review
data available from past stream sampling
around the Northside Sanitary Landfill
and ECC.

Date: 03/05/81
Document No.: 0101
Key Word: Sampling/Testing
Description: ISBH conducts water sampling at
residential wells around the Northside
Sanitary Landfill and ECC.

Date: 03/06/81
Document No.: 0091
Key Word: Community Relations
Description: The Indianapolis Star prints "Attorney
General Orders Probe of Enviro-Chem
Corporation."

Date: 03/06/81
Document No.: 0092
Key Word: Community Relations
Description: The Reporter prints "Attorney General
Enters Enviro-Chem Corporation Probe."

Date: 03/06/81
Document No.: 0084
Key Word: Site Data
Description: J. T. Fitch (SWMS) submits: RCRA
Inspection Report - Interim Status
Standards Treatment, Storage, and
Disposal Facilities.

Date: 03/10/81
Document No.: 0094
Key Word: Community Relations
Description: City & State prints "State Tests Streams Near Enviro-Chem."

Date: 03/10/81
Document No.: 0113
Key Word: Sampling/Testing
Description: ISBH undertakes stream and sediment sampling in Finley Creek and the unnamed ditch adjoining ECC and the Northside Sanitary Landfill properties. A total of 17 water samples and 18 sediment samples were collected.

Date: 03/17/81
Document No.: 0085
Key Word: Community Relations
Description: The Reporter prints "Enviro-Chem Fined \$28,800 by IOSHA."

Date: 03/17/81
Document No.: 0097
Key Word: Community Relations
Description: The Reporter prints "Plant Inspection Pending; Enviro-Chem Fined \$28,800 by IOSHA," as well as, "Commissioners Deny Request on Landfill Rezoning."

Date: 04/14/81
Document No.: 0102
Key Word: Sampling/Testing
Description: C. N. Ott (ISBH) reports that chemical analyses have been completed for the nine residential wells sampled on 3/5/81 around the Northside Sanitary Landfill and ECC. He states that analyses do not indicate the presence of any material not normally found in groundwater in that area of the state and concludes that the wells do not appear to be contaminated by leachate at this date.

Date: 04/28/81
Document No.: 0105
Key Word: Site Visits
Description: EMB conducts an inspection of the ECC barrel storage facility and discovers conditions in violation of RCRA and of the Environmental Management Act.

Date: 05/13/81
Document No.: 0111
Key Word: Site Visits
Description: EMB inspects ECC's barrel storage facility to review progress made in eliminating violations cited in the 4/22/81 inspection. Inspection showed that the number of leaking and "popped top" containers were reduced in number as ordered.

Date: 05/19/81
Document No.: 0115
Key Word: Site Visits
Description: G. J. Hauvermale and K. M. Simonson (Boone County Public Health Department) visit ECC to inspect the level of surface water being retained in the southeast corner of the barrel storage area.

Date: 06/12/81
Document No.: 0123
Key Word: Site Visits
Description: EMB re-inspects the barrel storage facility at ECC. It was noted that there were no leaking barrels and only four "popped top" barrels in the facility.

Date: 06/22/81
Document No.: 0117
Key Word: Community Relations
Description: Indianapolis Business Journal prints "Enviro-Chem: The Controversy Burns On."

Date: 06/25/81
Document No.: 0124
Key Word: Site Visits
Description: P. Rarick (OAG) and T. Fitch (SWMS) conduct an inspection of the ECC processing area to determine the progress made in up-grading the barrel storage facility.

Date: 07/01/81
Document No.: 0120
Key Word: Legal Action
Description: The Boone County Circuit Court issues a Consent Decree containing essentially all items of the originally proposed decree with the addition of an imposed

civil penalty of \$50,000.00. The decree placed the company in receivership and prohibited ECC from ever utilizing the Northside Sanitary Landfill for disposal of waste it has generated. According to the decree, ECC was given until 11/01/82 to return to complete compliance with environmental laws and regulations.

Date: 07/02/81
Document No.: 0122
Key Word: Community Relations
Description: The Indianapolis Star prints "Recycling Firm Will Pay \$50,000 Fine."

Date: 07/16/81
Document No.: 0127
Key Word: Site Data
Description: T. Fitch and P. Allen (SWMS) conduct an inspection of the Four County Landfill near DeLong, Indiana and observe an ECC shipment arriving onsite. The manifest stated that the shipment contained "hazardous waste NOS (still and drum bottoms)" but sampling proved the drums to be filled with a liquid that had a concentrated solvent vapor. The shipment was refused and returned to ECC. ECC was reprimanded and warned to ship only approved wastes to Four County Landfill for disposal.

Date: 07/30/81
Document No.: 0129
Key Word: Site Data
Description: T. Fitch (SWMS) conducts an inspection of the ECC Barrel Storage facility and notes no improvements since the previous week's inspection.

Date: 08/07/81
Document No.: 0132
Key Word: Site Visits
Description: SWMS inspects the ECC Barrel Storage area and finds it to be extremely crowded with barrels of waste and in violation of RCRA regulations.

Date: 09/00/81
Document No.: 0135
Key Word: Legal Action
Description: ECC submits it's Voluntary Cleanup Plan (Phase I to commence on 9/15/81).

Date: 09/02/81
Document No.: 0133
Key Word: Community Relations
Description: Indiana Environmental Health News prints
"The Enviro-Chem Recycling Corporation's
operations in Boone County have had no
negative effect on public health,
although these operations have
contributed to polluting nearby
waterways . . ."

Date: 09/11/81
Document No.: 0139
Key Word: Legal Action
Description: D. M. Finton (ECC) requests special
approval for the disposal of 500 cu yds
of oil and paint contaminated soil at
Northern Sanitary Landfill.

Date: 09/15/81
Document No.: 0143
Key Word: Site Visits
Description: J. T. Fitch (SWMS) conducts an
inspection of ECC's barrel storage
facility. He noted work was being done
to reduce barrel inventory, to drain the
area of ponded surface water, and to
clear an area for construction of a
concrete drum storage pad.

Date: 09/25/81
Document No.: 0144
Key Word: Site Visits
Description: J. T. Fitch (SWMS) conducts an
inspection of ECC's barrel storage
facility and notes an excessive number
of barrels remaining onsite but
preparation was continuing for the
construction of the concrete drum
storage pad.

Date: 09/29/81
Document No.: 0145
Key Word: Site Visits
Description: J. T. Fitch (SWMS) conducts an
inspection of ECC's barrel storage area
and observes several setbacks in cleanup
progress.

Date: 09/30/81
Document No.: 0170
Key Word: Generators/Waste Inventory

Description: Manifest documents dated 9/30/81 show Great Plains Bag Corporation to have shipped 15 drums of flammable solvents to ECC via Northway Environmental Service. At this time ECC was under court orders not to accept any hazardous waste.

Date: 10/02/81
Document No.: 0145
Key Word: Site Visits
Description: J. T. Fitch (SWMS) inspects the barrel storage area and estimates drum inventory to be in excess of 20,000 drums while ECC authorities claim there to be 16,300 barrels onsite. J. Wessel (ECC) presents Mr. Fitch with a production report that will be completed by ECC on a weekly basis.

Date: 10/06/81
Document No.: 0146
Key Word: Site Visits
Description: J. T. Fitch (SWMS) conducts an inspection of the ECC site and takes 8 samples of contaminated soil.

Date: 10/14/81
Document No.: 0148
Key Word: Site Visits
Description: J. T. Fitch (SWMS) conducts an investigation of progress of cleanup activities as well as concrete pad construction at the barrel storage facility. Fitch made a second inspection on 10/16/81.

Date: 10/21/81
Document No.: 0150
Key Word: Site Visits
Description: J. T. Fitch (SWMS) inspects ECC's barrel storage facilities and production areas and notes several hazardous situations.

Date: 10/27/81
Document No.: 0154
Key Word: Site Visits
Description: J. T. Fitch (SWMS) randomly inspects the work product records of ECC clients to confirm that waste analyses had been received from the generators or adequate testing had been performed by ECC laboratory prior to acceptance by the

facility.

Date: 11/02/81
Document No.: 0150
Key Word: Sampling Testing
Description: R. C. Pickard (EMB) reports findings of ISBH Laboratories' analysis of contaminated soil samples obtained on 10/06/81 by J. T. Fitch (SWMS). It was found that when the soil was heated it exhibited the hazardous waste characteristic of ignitability. This qualifies the soil as hazardous waste as defined in 40 CFR 261.3 and must therefore be disposed of at an approved hazardous waste site.

Date: 11/04/81
Document No.: 0151
Key Word: Legal Action
Description: P. B. Rarick (OAG) presents a rough outline of most deadlines from the ECC consent Decree to G. Watson, Attorney at Law, receiver for ECC.

Date: 11/06/81
Document No.: 0155
Key Word: Site Visits
Description: J. T. Fitch (SWMS) visits ECC to review sampling and testing procedures of incoming loads with A. Spinner (ECC). Fitch also reviewed personnel records of those engaged in the handling of hazardous wastes including management personnel and found them to be inadequate under RCRA regulations. Operator inspections were also found to be inadequate.

Date: 11/24/81
Document No.: 0156
Key Word: Site Visits
Description: J. T. Fitch (SWMS) conducts an inventory of the nonprocessed barrels of waste located at ECC and determines the total number of barrels to be 23,171.

Date: 12/01/81
Document No.: 0156
Key Word: Site Visits
Description: J. T. Fitch (SWMS) conducts an inventory of the number of leaking, former leaking, popped top, corroded/damaged,

and open top/bungless barrels onsite and on trailers offsite and determines the total number of barrels to be 223.

Date: 12/18/81
Document No.: 0158
Key Word: Legal Action
Description: ISBH makes recommendations to ECC in an effort to achieve compliance with all state and Federal Hazardous Waste Regulations. All recommendations were submitted with deadlines for completion as well as fines to be levied if the recommendations were not met.

Date: 12/31/81
Document No.: -159
Key Word: Legal Action
Description: R. C. Pickard (EMB) writes L. Pearson (OAG) to report several violations on the part of ECC of RCRA regulations as well as the agreed order signed July 1, 1981. Pickard explained that ECC was given until January 13, 1982, to bring the operation into full compliance. Pickard suggested that legal action should be taken and a fine levied if this deadline is not met. He also requested that action be taken to assure reduction of barrel inventory. *start*

Date: 01/02/82
Document No.: 0160 *copy*
Key Word: Site Data
Description: R. Strong (ECC) submits documentation concerning ECC's post accident restructuring program to the ISBH.

Date: 01/12/82
Document No.: 0161
Key Word: Site Data
Description: R. C. Pickard (EMB) writes G. Watson, receiver for ECC to state that contaminated sludge and soil previously considered to be ignitable hazardous waste had been determined to be hazardous waste by definition only and is suitable for disposal in an environmentally safe manner. Pickard requested ECC submit a plan for disposal immediately.

Date: 01/25/82 *copy*

Document No.: 0167
Key Word: Site Visits
Description: J. T. Fitch (SMMS) inspects the site and instructs ECC not to ship or receive shipments of waste without both a manifest and a lab analysis for the waste. Violations of the Consent Decree were also discussed.

Date: 01/28/82
Document No.: 0164
Key Word: Sampling/Testing
Description: C. L. Bridges (ISBH) reports results of a bioaccumulation study conducted on live freshwater mussels in Finley Creek. Analysis showed lead, mercury, silver, PCB's, Aldrin, DDT, Heptachlor, Diazinon, Strobane, and Malathion were not found at detectable levels.

Date: 02/09/82
Document No.: 0166 *cmg*
Key Word: Legal Action
Description: EME imposes a restriction on drum shipments to ECC of 200 drums per week until further notice. This freeze was imposed before the Boone County circuit Court to assure compliance with the Consent Decree regarding storage of drums, location and identification of material onsite and being shipped, and removal of sludge.

Date: 05/05/82 *cmg*
Document No.: 0005
Key Word: Legal Action
Description: Boone County Circuit Court Judge R. E. Drury orders ECC to close and environmentally secure its site for failure to reduce hazardous waste inventories. The order included requirements to cease receiving hazardous wastes and to submit a closure plan to the court.

Date: 05/07/82
Document No.: 0168
Key Word: Legal Action
Description: G. L. Watson, the Court's Receiver, files Phase I of the Closure Plan for ECC before J. Caldwell, Boone County Circuit Court, pursuant to the court's order of May 5, 1982.

Date: 06/04/82
Document No.: 0175
Key Word: Legal Action
Description: G. L. Watson, receiver for ECC files
Closure Plan with the Boone County
Circuit Court.

Date: 07/16/82
Document No.: 0175
Key Word: Legal Action
Description: R. C. Pickard (EMB) acknowledges receipt
of the closure plan filed with the Boone
County Circuit Court on June 4, 1982.

Date: 08/00/82
Document No.: 0222
Key Word: Legal Action
Description: ECC declares bankruptcy.

Date: 08/30/82
Document No.: 0181
Key Word: Sampling Testing
Description: G. H. Madany (EPA) reports analysis
results of grab water samples obtained
at the ECC pond on 8/9/82. Upon review
of the results Madany concluded that no
emergency action was justifiable.

Date: 08/30/82
Document No.: 0183
Key Word: FIT/TAT/REM Activities
Description: Wastex Research, Inc. submits four (4)
separate proposals for "Environment
revitalization, cleanup, and recycling
of the ECC's waste site," to Attorney
General Linley Pierson in Boone County
Circuit Court.

Date: 09/00/82
Document No.: 0222
Key Word: Generators/Waste Inventory
Description: The generators entered into a loose
coalition and hired Chemical Waste
Management, Inc. to prepare a technical
proposal for a complete surface cleanup.
The generators then offered to pay for
drum removal only in return for a
complete release.

Date: 09/12/82
Document No.: 0184
Key Word: Community Relations

Description: Sun Times prints "Big Waste Dump Peril in Indiana."
Date: 09/13/82
Document No.: 0188
Key Word: Community Relations
Description: D. F. Johnstone, M.D., writes U.S. Senator R. G. Lugar requesting his assistance in seeking coverage under the Superfund Program for cleanup of the ECC site.

Date: 09/15/82
Document No.: 0185
Key Word: FIT/TAT/REM Activities
Description: McKesson Enviro-Systems, a major recycling company, confirms its position and interest in working with the State of Indiana, and Commercial Pumping to cleanup the ECC site by accepting a large volume of specified products and waste for recycling.

Date: 09/21/82
Document No.: 0189
Key Word: Generators/Waste Inventory
Description: The OAG holds a conference with the ISBH and representatives from approximately 60 generators to propose a voluntary cleanup plan for the ECC site. The closure plan and settlement offer required generators to remove and dispose of wastes and pay \$250/drum into a trust fund to be used for remaining surface/subsurface remedial actions. In return, generators would receive a limited release. Generators were to state their intent to participate by 10/15/82.

Date: 09/24/82
Document No.: 0188
Key Word: Community Relations
Description: U.S. Senator R. G. Lugar writes A. Gorsuch, (U.S. EPA) to express concerns over the ECC situation and to request her consideration of the area for cleanup under the Superfund Program for addition to the National Contingency Plan Listing.

Date: 09/28/82
Document No.: 0186

Key Word:
Description:

Community Relations
D. West, private citizen, calls the APCD to complain about heavy offensive odors emanating from the vicinity of the Northside Sanitary Landfill and ECC on the evening of 9/27/82. R. Bowser and C. Wilson of the division investigate but determine no cause or source of the odors.

Date:
Document No.:
Key Word:
Description:

09/30/82
0192
Legal Action
The subcommittee on Environment, Energy and Natural Resources of the U.S. Congress requests all reports, analyses, memoranda, and other documents in EPA's possession relating to the ECC site in a letter to A. Gorsuch (U.S. EPA).

Date:
Document No.:
Key Word:
Description:

09/30/82
0193
Community Relations
The Indianapolis Star prints "Zionsville Waste Pond Object of 2 Federal Investigations."

Date:
Document No.:
Key Word:
Description:

10/00/82
0199
FIT/TAT/REM Activities
Remedial Response Section requests that the Center for Disease Control/Superfund Implementation Group (CDC/SIG) review sample data for the cooling pond and a residential well related to the ECC site. The conclusion of the CDC/SIG was that the low levels detected did not represent a risk deviating significantly from the norm.

Date:
Document No.:
Key Word:
Description:

10/01/82
0194
Community Relations
The Lebanon Reporter prints "Special Report Blames Plant, Not Landfill for Toxic Woes."

Date:
Document No.:
Key Word:
Description:

10/01/82
0195
Community Relations
The Indianapolis Star prints "EPA to Seek Draining of Hazardous Waste Pond."

Date: 10/02/82
Document No.: 0196
Key Word: Community Relations
Description: The Indianapolis Star prints "State Sets Deadline on Waste Site."

Date: 10/05/82
Document No.: 0197
Key Word: Community Relations
Description: The Indianapolis Water Company expresses concern over possible contamination of drinking water by ECC and/or Northside Sanitary Landfill to the ISBH.

Date: 10/05/82
Document No.: 0198
Key Word: Community Relations
Description: The Indianapolis Star prints "Geologist Defends Landfill Growth."

Date: 10/11/82
Document No.: 0205
Key Word: Community Relations
Description: D. Quayle (U. S. Senator) encourages A. Gorsuch (U.S. EPA) to evaluate the ECC site and consider listing the area on the Contingency Plan for cleanup under the Superfund program.

Date: 10/14/82
Document No.: 0204
Key Word: Community Relations
Description: Indiana Environmental Health News prints "State Health Commissioner Ronald G. Blankenbaker, M.D., Thursday called on anyone with information regarding potentially adverse health impacts of the Enviro-Chem/Northside Sanitary Landfill Sites in Boone County to supply that information to the Indiana State Board of Health immediately."

Date: 10/18/82
Document No.: 0211
Key Word: FIT/TAT/REM Activities
Description: G. Cekus (E&E) assists EPA personnel in sampling of the liquids in the cooling pond and drum storage sections of the ECC plant. A total of (6) locations were sampled. Twenty-nine samples were returned to the CRL for analysis.

Date: 10/19/82

Document No.: 0214
Key Word: Generators/Waste Inventory
Description: Approximately 80 representatives from generators meet in New York City for the purpose of submitting a response to the state's voluntary cleanup plan for ECC.

Date: 10/22/82
Document No.: 0212
Key Word: FIT/TAT/REM Activities
Description: ISBH issues cost estimates of the surface cleanup plan for ECC.

Date: 11/19/82
Document No.: 0226
Key Word: Legal Action
Description: A. M. Gorsuch (U.S. EP), informs U.S. Senator R. G. Lugar that she has submitted ECC for consideration to be eligible for Superfund monies.

Date: 11/22/82
Document No.: 0229
Key Word: FIT/TAT/REM Activities
Description: Chemical Waste Management, Inc., Environmental Remedial Action Division (ENRAC) submits: Technical Proposal for Removal and Disposal of Drummed Hazardous Chemicals and Waste Materials located at Environmental Conservation and Chemical Corporation, Zionsville, Indiana.

Date: 12/01/82
Document No.: 0223
Key Word: FIT/TAT/REM Activities
Description: T.R. West submits a proposal for disposal of cooling pond water, surface water and contaminated sludge for ECC site. ✓

Date: 12/03/82
Document No.: 0225
Key Word: FIT/TAT/REM Activities
Description: J. A. Dikinis (U.S EPA) meets with P. Rarick (OAG) to discuss the proposed settlement for cleanup of the ECC site.

Date: 12/06/82
Document No.: 0226
Key Word: Legal Action
Description: R. M. Lavelle writes U.S. Senator Quayle to announce that the ECC facility is

being considered for inclusion in the
National Priorities List.

Date:
Document No.:
Key Word:
Description:

01/03/83
0233 ✓
FIT/TAT/REM Activities
E&E issues REM-Field Investigation Team
site safety plan.

Date:
Document No.:
Key Word:
Description:

01/20/83
0233 ✓
FIT/TAT/REM Activities
Initial site visit by CH2M HILL, EPA,
and ISBH personnel for preparation of
RAMP.

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

Mr. Gary L. Watson
Attorney at Law
P.O. Box 110
Lebanon, IN 46052

AUG 27 1982

Dear Mr. Watson:

Re: Inspection of Enviro-Chem

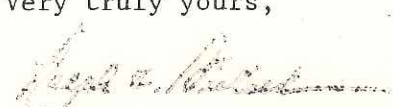
This letter is in reference to the inspection of the Enviro-Chem site conducted July 30, 1982, by Mr. Gary F. Lindgren of the Division of Land Pollution Control. Mr. Bill Weddle represented Enviro-Chem at the inspection.

Mr. Weddle stated that workers' compensation insurance for the employees of Enviro-Chem will expire by August 3, 1982. He stated that electricity to the Enviro-Chem site will be disconnected on the same date. Without such insurance and electricity, the employees of Enviro-Chem cannot continue the barrel reduction, processing, and overall site clean up efforts. Insurance coverage is necessary to ensure protection of the employees working at the site. Electricity is necessary to operate the pumps and distillation units. It is strongly suggested that you take measures to ensure continuance of workers' compensation coverage and electrical service to the site.

The water level in the cooling pond is still above normal. The pump for the pond is inoperative, and as a result the pond has gone septic. The liquid level in the north storage area is still high, and contaminated liquids were observed in the ditch surrounding the south storage pad. Progress has been made in the clean up of the south storage pad, and in the reduction of materials in the north storage area.

If you have any questions regarding this letter, please contact Mr. Gary F. Lindgren of the Division of Land Pollution Control at 317/633-0196.

Very truly yours,

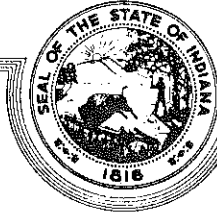

Ralph C. Pickard
Technical Secretary

GFL/tw

cc: Mr. Phil Rarick, Deputy Attorney General
Boone County Health Department
Mr. Richard Shandross, U.S. EPA ✓

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P.O. Box 1964
AUG 04 1982

IND 084259951

9/21/82
BES

Mr. Gary L. Watson
Attorney at Law
P.O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: July 15, 1982, Inspection of the
Environmental Conservation and
Chemical Corporation (ECC)

*As of 9/21/82
I have not received
this inspection
BES*

This letter confirms the July 15, 1982, inspection of the above-referenced facility by Mr. Gary F. Lindgren of the Division of Land Pollution Control. Mr. Lindgren met with Mr. Bill Weddle of the Environmental Conservation and Chemical Corporation.

Mr. Weddle informed Mr. Lindgren that the payroll at ECC had been reduced to five people. He observed that reduced revenues from the sale of recovered materials necessitated the personnel reductions.

The cooling pond level has been raised due to recent rainfall. However, the dike preventing off-site movement appears secure. Should further rainfall increase the level of the cooling pond, actions should be taken to reinforce the dike. The cooling pond water has become septic and requires further aeration.

The recent rainfalls have also raised the liquid levels on the south storage pad and in the north pit storage area. The water is up to the bottom chime of the drums in those areas. There has been some overflow from the south storage pad into the ditch surrounding the pad.

There has been some progress on the south storage pad with respect to the processing of drums. There also has been some activity with respect to clean-up of the sludge solidification area. Drums in that area have been covered with plastic.

If there are any questions concerning any of the above matters,
please contact Mr. Gary F. Lindgren at 317/633-0196.

Very truly yours,

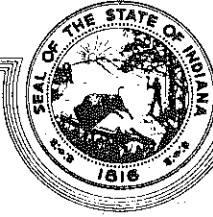
Ralph C. Pickard
Technical Secretary

GFL/jmt

cc: Mr. Richard Shandross, U.S. EPA ✓
Boone County Circuit Court
Boone County Health Department
Mr. Bill Weddle, ECC

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street

P. O. Box 1964

JUL 30 1982

9/21/82
NES

Mr. Gary L. Watson
Attorney at Law
P.O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: July 2, 1982, Inspection of the
Environmental Conservation and
Chemical Corporation

This letter confirms the July 2, 1982, inspection of the above-referenced facility by Mr. J. Thomas Fitch and Mr. Gary F. Lindgren. Messrs. Fitch and Lindgren met with Mr. Bill Weddle of the Environmental Conservation and Chemical Corporation. Mr. Weddle clarified a misunderstanding which appeared in earlier correspondence. The waste creosote noted in that correspondence actually was alkylation of cresols. The waste is non-hazardous. It was generated by Koppers Company, Inc., Oil City, Pennsylvania, and was transported to ECC by Mays Corporation, Pittsburgh, Pennsylvania. Please disregard the demand made concerning the submission of information concerning this waste.

Mr. Weddle stated that he and Tony Clark were assimilating the information concerning wastes processed since May 5, 1982. This information should be available by July 12, 1982. Records of wastes processed should be recorded daily on the facility's operating record.

Messrs. Fitch and Lindgren requested to see a copy of the Environmental Liability Policy referred to in your closure plan. The form was not available at the site. Mr. Weddle stated that you possessed all copies. Please send a copy of this policy to Mr. Lindgren so that it can be reviewed.

Mr. Weddle explained that all wastes stored on the south lot storage area, and stored in bulk are being processed. The still bottoms generated during reclamation are stored in the bulk tank from which the wastes came. Drum bottoms generated during reclamation are placed into storage on the south lot storage pad. "Empty drums" are being segregated and sent to Columbus Steel Drum, Columbus, Ohio.

Spray irrigation continues in the north pit and north lot storage areas. The hoses used for spray irrigation are placed so that the water drains into the facility and not off-site. Mr. Weddle feels that this operation will not further contaminate the grounds of ECC. This operation is not undertaken in the south lot storage area because this is where personnel are working.

The cooling pond level has subsided. Diking along the east boundary appears to be sound. There still exists a cross-connection between the north pit storage area and the cooling pond. Mr. Weddle acknowledges a slight increase in the contamination of the cooling pond water due to this cross-connection, but feels that it is not significant. The cooling pond water is becoming septic and needs to be further aerated.

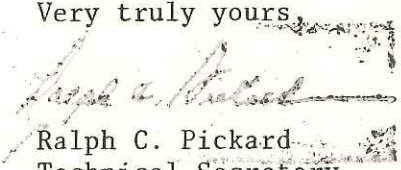
Mr. Clark has begun the clean up of the former solids and liquids processing area. The water in this area should be processed, and then stored in the cooling pond. The waste should be packaged in containers and placed into storage.

The south lot storage area was cleared of containers on the west 20 percent of the pad. Since this area has been cleared, processing of barrels stored in the north pit and north lot areas can be initiated. This area will be filled with the drum bottoms generated from the processing. Drums found in the storage area without bungs or lids should be secured immediately.

Mr. Weddle agreed to excavate the soil contaminated with cooling pond water when the cooling pond water overflowed into the unnamed ditch to the east of the ECC property. He also agreed to place this waste into containers and stage for disposal.

If there are any questions concerning any of the above matters, please contact Mr. J. Thomas Fitch at 317/633-0215.

Very truly yours,

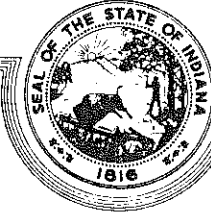

Ralph C. Pickard
Technical Secretary

JTF/tw

cc: Mr. Phil Rarick, Deputy Attorney General
Mr. Richard Shandross, U.S. EPA ✓
Boone County Circuit Court
Boone County Health Department
Mr. Bill Weddle, ECC

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964
JUL 23 1982

9/21/82
JES

Mr. Gary L. Watson
Attorney at Law
P. O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: June 24, 1982, Inspection of the
Environmental Conservation and
Chemical Corporation

On the above-referenced date, Messrs. J. Thomas Fitch and Lee Langlotz met with Mr. William Weddle to inspect the Environmental Conservation and Chemical Corporation. The purpose of the inspection was to assess the potential environmental problems associated with the site. The following is a compilation of that assessment.

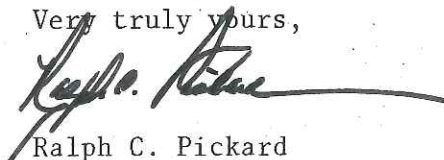
1. The solids and liquids processing area is filled with wastes that have not been processed for disposal. These wastes have been stored in this area since May 5, 1982. This waste shall be containerized in drums and staged for disposal. The wastes in this area which are not currently stored on the concrete processing pad are of greatest concern. These wastes shall be processed first.
2. During the time of the inspection, cooling pond water was being spray irrigated over the inner slopes of the north earthen levy. The water was also sprayed over drums stored in the north pit storage area. It is my understanding that ECC was informed they could not continue this practice. This is due to the potential contamination of the earth within the facility. If ECC wishes to spray irrigate the cooling pond water they must do so in the south lot concrete storage area. Due to the impermeable concrete pad, there is minimal chance that any further contamination of the soil on the ECC site will occur.
3. There is a direct connection between the north pit storage area and the cooling pond. Due to this connection, the cooling pond is being further contaminated by wastes which have leaked from barrels in the north pit area. This connection shall be severed to control the contamination of the cooling pond.
4. The cooling pond water level has subsided. The water is not overflowing into the unnamed ditch as observed during previous inspections. The cooling pond water should continue to be

aerated to avoid a septic condition and to evaporate as much water as is possible. The water quality of the cooling pond should continue to be monitored weekly, and these analyses held on file.

5. The water level in the barrel storage areas have decreased. There is still a great deal of water in these areas which needs to be processed and disposed. As stated in earlier correspondence, barrels will deteriorate at a much faster rate if allowed to stand in water. The longer these barrels are stored in water, the faster they will begin leaking, contaminating the water and the soil on-site.

Mr. Fitch informs me that wastes from the south lot storage area are being processed. It is our opinion that this is not what was agreed to during the May 5, 1982, hearing in Boone County Circuit Court. As we interpret it, Environmental Conservation and Chemical Corporation agreed to process damaged and leaking drums first, followed by drums stored off the impermeable pad, and finally drums stored on the pad. You should contact this office within ten days of the receipt of this letter to explain why this agreement has not been kept.

Very truly yours,



Ralph C. Pickard
Technical Secretary

JTF/tw

cc: Mr. Bill Weddle, ECC
Boone County Circuit Court
Boone County Health Department
Mr. Richard Shandross, U.S. EPA
Mr. Phil Rarick, Attorney General's Office

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street

P. O. Box 1964

JUL 22 1982

9/21/82
JES

Mr. Gary L. Watson
Attorney at Law
P.O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: Verification of Waste Stream

In my most recent correspondence concerning the June 10, 1982, inspection of the Environmental Conservation and Chemical Corporation, I requested that you supply this office with information concerning a "creosote" waste. The waste stream in question had been stored in tankers at the ECC site outside the secured facility.

On July 2, 1982, Messrs. J. T. Fitch and Gary F. Lindgren were supplied information concerning the waste in question. It was determined that the waste is not creosote but alkylation of cresols. The waste was received at the site on November 18, 1981, from Koppers Company, Inc., Oil City, Pennsylvania. The transporter of the waste was the Mays Corporation of Pittsburgh, Pennsylvania.

Please disregard the demands made concerning this waste.

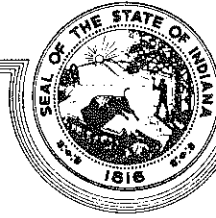
Very truly yours,


Ralph C. Pickard
Technical Secretary

JTF/tw

cc: Mr. Richard Shandross, U.S. EPA ✓
Mr. Phil Rarick, Attorney General's Office
Boone County Health Department
Boone County Circuit Court

STATE OF INDIANA



INDIANAPOLIS, 46206

ENVIRONMENTAL MANAGEMENT BOARD

JUN 28 1982

1330 West Michigan Street
P. O. Box 1964

Mr. Gary Watson
Attorney at Law
P.O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: June 10, 1982, Inspection of the
Environmental Conservation and Chemical
Corporation Facility

On June 10, 1982, Messrs. J. Thomas Fitch and Ted Warner, Division of Land Pollution Control, inspected the above-referenced facility. They met with Mr. William Weddle. Messrs. Fitch and Warner noted the following problems during their inspection:

1. The level of the water in the cooling pond has not subsided. The water has continued to overflow into the unnamed ditch to the east of the property. Minimal activity has been undertaken to control this situation. Additional sandbags should be purchased to control the overflow of the contaminated cooling pond water into the unnamed ditch. Also, steps should be taken to lower the level of the water in the cooling pond. This problem will be closely monitored.
2. The storage areas for barrels continue to be covered with ponded rain water. The water levels range from a few inches to over one foot. As noted in an earlier correspondence, this contaminated water provides a vehicle for contamination. Leaking barrels of waste and spilled waste mixes with this water. The water in the north pit storage area is directly linked with the cooling pond causing additional pollution to this cooling water.

The water in the south lot storage area is in excess of one foot, over 25 percent of the concrete pad. The contaminated rain water has overflowed into the ditch between the concrete pad and the earthen dike. The contaminated water in all storage areas needs to be controlled, processed, and disposed. This is a priority problem and shall be monitored.

3. There is contaminated rain water in the solids and liquids processing area. The drum bottom waste in this area is not completely stored on the concrete pad. This water should be processed and disposed. All of the waste must be placed on the concrete processing pad.

Shardless

9/21/82
YES

4. There are two tankers of creosote waste stored outside the storage facility. This waste should be stored within the facility with the other hazardous wastes. You shall contact this office to explain whose waste this is, and why it is illegally stored.

The following are observations made by Messrs. Fitch and Warner:

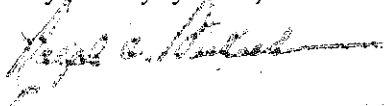
1. The cooling tower and boiler were both operational.
2. Empty drums are staged off-site prior to transporting them to a reclaimer. Ensure that all barrels are completely empty.

This office would like the following documents from you:

1. A list of all materials processed since May 5, 1982. This document should include generator's name and address, type of waste processed, and location of the waste before processing. Also, the total number of barrels processed and the purchaser of the reclaimed material.
2. Inspections of this facility since May 5, 1982. These inspections should note the problems associated with the facility and corrective actions initiated to control these problems.
3. A listing of all brokered wastes on-site. The generator's name and address and total volume of the waste. Also include the location of the waste on-site.

If you have any questions on any of the above matters, please contact Mr. Fitch at 317/633-0215.

Very truly yours,


Ralph C. Pickard
Technical Secretary

JTF/tw

cc: Mr. Richard Shandross, U.S. EPA
Boone County Circuit Court
Boone County Health Department
Mr. Phil Rarick, Attorney General's Office
Mr. William Weddle, ECC

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD

Mr. Gary Watson
Attorney at Law
P.O. Box 110
Lebanon, IN 46052

JUN 18 1982



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

JUN 23 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

Dear Mr. Watson:


Re: June 4, 1982, Inspection of the
Environmental Conservation Chemical
Corporation Facility

On June 4, 1982, Mr. J. Thomas Fitch, Division of Land Pollution Control, inspected the Environmental Conservation and Chemical Corporation's facility. Mr. Fitch was accompanied during the inspection by Mr. William Weddle.

During the inspection of the site, Mr. Fitch found that much of the barrel storage areas were under water. The water level in the storage areas ranges from a few inches to over one foot. The contaminated rainwater is a vehicle for possible contamination of the soil, groundwater, and surface water. This water must be dealt with immediately. Mr. Fitch noted that the water level of the cooling pond is still near capacity. Pond water was not entering the unnamed ditch to the east of the facility as previously noted, but it is felt that the water level must be decreased or additional levies built to minimize the chances of this occurring again. A direct link between the cooling pond and the north pit storage area exists. This connection needs to be severed.

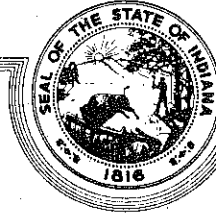
Mr. Fitch noted that additional "pockets" had been opened in the south lot concrete storage area. Drums of waste from this storage lot are being processed. The still bottoms generated from the processing of these drums are being placed onto the concrete pad for storage. No wastes have been processed except for those stored on the concrete storage pad. There was contaminated water found on the perimeter of the concrete storage pad between the earthen dike and the concrete pad. This contaminated water should be processed immediately. The cooling tower was still functional and the boiler had not yet been repaired.

Very truly yours,


Ralph C. Pickard
Technical Secretary

JTFitch/tr

cc: Mr. Philip Rarick, Deputy Attorney General
Boone County Circuit Court
Boone County Health Department
Richard Shandross, Region V, U.S. EPA ✓
Mr. Bill Weddle



JUN 14 1982

Mr. Gary Watson
Attorney at Law
P.O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:


Re: May 27, 1982, Inspection of the
Environmental Conservation and
Chemical Corporation Facility

This letter confirms the May 27, 1982, inspection of the Environmental Conservation and Chemical Corporation facility by Messrs. J. Thomas Fitch and Gary F. Lindgren, Division of Land Pollution Control. The following observations were made at that time:

1. Cooling pond water was flowing into the unnamed ditch located east of the facility. The flow of the water was cut off using sand bags. There was no way of estimating what volume of water entered the unnamed ditch prior to the inspection. Due to recent rains, and the breakdown of an aeration pump, the water level of the cooling pond has risen above capacity. There is also a direct connection between the north pit area and the cooling pond. This problem shall be controlled immediately.
2. There were "pockets" open in the south lot storage area. This indicates a reduction of barrels in this area. Mr. Bill Weddle estimates that there are between 20,000 and 21,000 barrels on site. Mr. Weddle estimates that there is an average reduction of approximately 600 drums per week. Waste material generated from the processing is being placed into storage on the concrete pad. Mr. Weddle explained that areas need to be opened on the concrete pad before barrels of waste in the north lot storage area are processed. This is so there are spaces for the storage of stillbottom wastes generated from processing.
3. The cooling tower is now operational.
4. The boiler supplying steam heat to the stills was being repaired. Because the boiler was not functional, no processing was occurring during the time of the inspection.
5. There is excessive water in all storage areas. This water needs to be processed and disposed of in an environmentally sound manner.

If there are any questions concerning any of the above, please contact Mr. J. Thomas Fitch at 317/633-0215.

Very truly yours,


Ralph C. Pickard
Technical Secretary

JTFitch/ds

cc: Boone County Circuit Court
Mr. Richard Shandross, Region V, U.S. EPA
Mr. Bill Weddle, ECC
Mr. Phil Warrick, Attorney General's Office

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

RECEIVED

MAY 21 1982

WASTE MANAGEMENT BRANCH
EPA REGION V

MAY 19 1982

Mr. Gary Watson
Attorney at Law
P.O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: May 3, 1982, Inspection of the
Environmental Conservation and Chemical
Corporation (ECC)

This letter confirms the May 3, 1982, inspection of the Environmental Conservation and Chemical Corporation by Messrs. J. Thomas Fitch, P. J. Rasor, and J. Shafer. Mr. Fitch met with Mr. Bill Weddle to inspect and take pictures of the facility. Messrs. Rasor and Shafer met with Mr. Tony Clark to review laboratory procedures.

During the inspection of the facility, Mr. Fitch noted that there had been some processing of barrels from the south lot storage area. There were empty "pockets" within this storage area. Mr. Fitch also noted that the contaminated water found between the south lot storage area and the earthen dike had been eliminated. Much of the contaminated water found during previous inspections had been processed.


The cooling tower was still not functional, but was in the process of being repaired. The cooling pond was lower than the previous week, and the oil slick was still present. The solid and liquids processing area was still under water, and ink wastes were present in this water.

The barrel reduction inventory showed a reduction of 506 drums for the week of April 19, 1982, and an increase of 84 drums for the week of April 26, 1982.

Mr. Rasor concluded that the laboratory management had greatly improved since his inspection conducted during the summer of 1981. However, he feels that ECC still does not meet RCRA standards. Specifically, the analyses for EP Toxicity and inorganics do not meet the requirements outlined in 40 CFR Section 261, Appendix II and III respectively.

If you have any questions concerning the above, please contact Mr. J. Thomas Fitch at 317/633-0215.

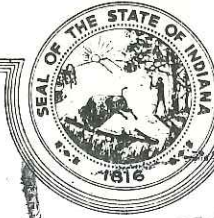
Very truly yours,


Ralph C. Pickard
Technical Secretary

JTF/tr

cc: Boone County Circuit Court
Boone County Health Department
Mr. Richard Shandross, U.S. EPA
Mr. Phil Rarick, Attorney General's Office
Mr. Bill Weddle, ECC
Mr. Roy Strong, ECC

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH
AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206

MAY 14 1982

Mr. William Weddle
Environmental Safety and
Transportation Director
Environmental Conservation and
Chemical Corporation
865 South U.S. 421
Zionsville, IN 46077

RECEIVED
MAY 17 1982
WASTE MANAGEMENT BRANCH
EPA REGION V

Dear Mr. Weddle:

Re: Your Letter Dated March 13, 1982

On the above-referenced date, you sent a letter to the U.S. Environmental Protection Agency, Region V, concerning the implementation of your contingency plan. You stated in the letter that on February 26, 1982, a D9 bulldozer owned by the Northside Landfill struck a loaded tanker containing hazardous waste causing the material to leak from this tanker. As stated, the material was contained on-site and the spill cleaned up.

Mr. J. Thomas Fitch, Land Pollution Control Division, contacted the Spill Response Team of the Water Pollution Control Division after learning about the spill. Mr. Fitch contacted them to determine if they had been notified concerning the said spill. They had not been contacted. This is a violation of 320 IAC 4-6-1, Section 1, and 40 CFR Section 265.56(h)(2)(i). There is also a question as to whether or not material was actually stored on-site. This question needs to be resolved.

Please contact Mr. John Hayworth, Water Pollution Control Division, and Mr. Fitch so that this matter can be resolved.

Very truly yours,

Guinn Doyle
Guinn F. Doyle, Chief
Hazardous Waste Management Branch
Division of Land Pollution Control

JTF/jb

cc: Mr. Richard Shandross, U.S. EPA, Region V
Phil Rarick, Deputy Attorney General
Boone County Health Department
Mr. Gary Watson, Attorney at Law

good for
Fitch!
PS 5/24/82

STATE OF INDIANA)
COUNTY OF BOONE) SS:

IN THE BOONE CIRCUIT COURT
CAUSE NO. C81-131

ENVIRONMENTAL MANAGEMENT BOARD
OF THE STATE OF INDIANA,

Plaintiff,

vs.

ENVIRO-CHEM CORPORATION,
JONATHAN W. BANKERT and
PATRICIA BANKERT,

Defendants.

FILED

MAY 12 1982

Jean Caldwell
CLERK BOONE CIRCUIT COURT

NOTICE TO RECEIVER

Comes now the Plaintiff, Environmental Management Board of the State of Indiana, and upon review of the Receiver's report entitled "Phase I of Closure Plan" now notifies the Receiver as follows:

1. Said plan fails to state the locations of the drums it proposes to process. Plaintiff would request the Receiver to process the drums according to the following priority:

- (a) First, process, repackage, or bulk material in drums not properly containerized;
- (b) Second, process drums located off the concrete pad;
- (c) Finally, process drums located on the concrete pad.

Plaintiff requests that said priority of removal be followed whenever possible and feasible for the purpose of reducing, to the extent possible, the number of drums not properly containerized and not on concrete pads.

2. Plaintiff objects to Part II of said plan, which proposes to pump drum material into bulk storage tanks, for the reason that such a plan would mix wastes from various generators making it impossible for generators to identify their wastes. Plaintiff would, however, propose pumping into bulk storage compatible material from drums not properly containerized, if such drums cannot be processed or repackaged.


3. Plaintiff requests the Receiver to immediately restructure salaries for all owners of Environmental Conservation and Chemical Corporation (identified herein as ECC) who draw compensation from ECC, so that such persons are not paid more than other employees of ECC who are similarly qualified.

4. Said plan fails to provide Plaintiff sufficient information to adequately access said plan. Plaintiff requests the Receiver to contact and consult with Plaintiff's staff prior to drafting the Comprehensive Closure Plan so that said staff has the opportunity to inform the Receiver of various areas of concern it believes said plan should address.

5. The Receiver's Comprehensive Closure Plan is to be filed with this Court on or before June 4, 1982 pursuant to this Court's order of May 5, 1982. Said Receiver has made certain public statements indicating he may propose in said plan to dispose some waste material from ECC at the Northside Sanitary Landfill located adjacent to ECC. Plaintiff notifies the Receiver that it will object and oppose such proposal if made, for the reason that any such plan would be in violation of Part II, Paragraph 16 of the Consent Decree approved by this Court on July 1, 1981, and Page 3, Paragraph 2 of an administrative agreed order, entitled In The Matter Of The Environmental Management Board Of The State Of Indiana vs. Northside Sanitary Landfill, Inc., Cause No. N-33. Said order is attached hereto as Exhibit 1 and incorporated herein.

Respectfully submitted,

LINLEY E. PEARSON
Attorney General of Indiana

By: 
Phillip B. Rarick
Deputy Attorney General

Office of Attorney General
219 State House
Indianapolis, IN 46204
(317)232-6195

CERTIFICATE OF SERVICE


I do hereby certify a copy of the foregoing NOTICE TO
RECEIVER was duly served upon:

Mr. Warren D. Krebs
PARR, RICHEY, OBREMSKEY
& MORTON
225 West Main Street
P.O. Box 666
Lebanon, IN 46052

Mr. Halbert W. Kunz
KUNZ & KUNZ
320 N. Meridian Street
Room 528
Indianapolis, IN 46204

Mr. Gary Watson
Attorney at Law
P.O. Box 110
Lebanon, IN 46052

by personal service this 12 day of May, 1982.


Phillip B. Rarick
Deputy Attorney General

Office of Attorney General
219 State House
Indianapolis, IN 46204
(317)232-6195

STATE OF INDIANA)
COUNTY OF MARION)

SS:

BEFORE THE ENVIRONMENTAL MANAGEMENT
BOARD OF THE STATE OF INDIANA

IN THE MATTER OF THE ENVIRONMENTAL
MANAGEMENT BOARD OF THE STATE OF
INDIANA,

Petitioner,

vs.

NORTHSIDE SANITARY LANDFILL, INC.,

Respondent.

CAUSE NO. N-33

AGREED FINDINGS OF FACT AND ORDER

A notice of hearing having been filed herein on the 16th day of April, 1981, and with the Environmental Management Board and Respondent being desirous of settling and compromising this action and having consented without hearing or adjudication of any issue of fact or law herein to the entry by any party hereto and without this Order constituting any admission with respect to any issue of fact or law herein:

FINDINGS OF FACT

NOW, THEREFORE, before the taking of any testimony, upon the consent of the parties hereto, and for purposes of this action only, the following FINDINGS are hereby made:

1. The Environmental Management Board of the State of Indiana (also herein referred to as the Board) is an agency of the State of Indiana, duly empowered to hold administrative hearings to determine whether or not there is a violation of the Indiana Environmental Management Act, IC 13-7, et seq., and to enter an order requiring the taking of such action as is indicated by the circumstances to cause the abatement of such condition.

2. Northside Sanitary Landfill, Inc. owns, operates, and maintains a sanitary landfill at 985 South U.S. 421, Zionsville, Indiana 46077.

EXHIBIT

7

3. The Board has jurisdiction over both the subject matter and the parties to this action.

4. Pursuant to the provisions of IC 13-7 and IC 4-22-1, notice of hearing was issued and service of same was made upon:

Mr. Jonathan Bankert, President
Northside Sanitary Landfill, Inc.
985 South U.S. 421
Zionsville, IN 46077

Mr. Willis K. Kunz
320 North Meridian Street
Indianapolis, IN 46204

5. Under Indiana Environmental Management Board Permit No. OPP 6-1 issued February 1, 1981, Northside Sanitary Landfill, Inc. is permitted to operate a sanitary landfill for the disposal of non-hazardous waste materials. Northside Sanitary Landfill, Inc. is also permitted to dispose of certain hazardous waste materials from specific generators under the terms of various approval letters written by the Indiana Environmental Management Board or its predecessor, the Indiana Stream Pollution Control Board.

6. The purpose of the hearing specified in paragraph 4 above was to determine whether Northside Sanitary Landfill, Inc. illegally accepted hazardous waste materials during the year 1980 generated by Hazardous Waste Disposal, Inc., Farmingdale, New York, and transported to Northside Sanitary Landfill, Inc. from Enviro-Chem Corporation in violation of 330 IAC 4-5-14(a).

AGREED ORDER

WEHREFORE, upon consent of the parties as aforesaid, it is hereby ORDERED, ADJUDGED AND DECREED as follows:

1. Respondent, Northside Sanitary Landfill, Inc., agrees to operate its sanitary landfill in compliance with regulation 330 IAC 4-5-14(a) and all other applicable statutes and regulations.

2. Respondent, Northside Sanitary Landfill, Inc. shall no longer accept any hazardous waste materials from the property of Enviro-Chem Corporation, or its agents, officers, employees or assigns for disposal at its above named sanitary landfill site. Northside Sanitary Landfill, Inc. further agrees not to accept any hazardous waste materials transported by Enviro-Chem Corporation, or any of its agents, officers, employees or assigns to Northside Sanitary Landfill, Inc.

3. Respondent, Northside Sanitary Landfill, Inc. further agrees not to accept for disposal any hazardous waste materials, as defined by 40 CFR 261 et seq., generated or transported from outside the State of Indiana for a period of one year commencing with the effective date of this Agreed Order.

4. Respondent, Northside Sanitary Landfill, Inc. agrees to pay One Thousand Five Hundred Dollars (\$1,500.00) to the Environmental Management Special Fund of the State of Indiana for reimbursement of expenses within ten (10) days of the effective date of this Agreed Order.

5. The Indiana Environmental Management Board agrees to withdraw this action as consideration for the terms of this Agreed Order. This Agreed Order shall have no force and effect until approved by the Indiana Environmental Management Board.

NORTHSIDE SANITARY LANDFILL,
INC.

By: W. B. Bunker

Title: President

Date: July 1, 1981

Attested: Dorothy Bunker
Secretary, Northside
Sanitary Landfill, Inc.

INDIANA ENVIRONMENTAL MANAGEMENT
BOARD OF THE STATE OF INDIANA

By: Joseph P. Bunker

Title: Technical Secretary

Date: July 1, 1981

STATE OF INDIANA)
COUNTY OF BOONE) SS:

IN THE BOONE CIRCUIT COURT
CAUSE NO. C81-131

ENVIRONMENTAL MANAGEMENT BOARD
OF THE STATE OF INDIANA,

Plaintiff,

vs.

ENVIRO-CHEM CORPORATION,
JONATHAN W. BANKERT and
PATRICIA BANKERT,

Defendants.

ORDER

Comes now Plaintiff, Environmental Management Board of the State of Indiana, by Ralph C. Pickard, Technical Secretary, and by Linley E. Pearson, Attorney General of Indiana, and Phillip B. Rarick, Deputy Attorney General, and files herein "Plaintiff's Verified Petition To Close Enviro-Chem Corporation And ^{To} Environmentally Secure Site" which Petition is in the following words, to-wit:

[H.I.]

The Court, being duly advised, NOW FINDS:

1. Environmental Conservation and Chemical Corporation, formerly Enviro-Chem Corporation, (hereinafter identified as ECC) has failed to remove the sludge and contaminated soil in the pit immediately north of the cooling pond, in violation of Part II, Paragraph 5 of the Decree.

2. ECC has approximately 14,000 barrels containing incoming material for recovery and non-recoverable waste which are stored in violation of Part II, Paragraph 6(B) and 6(C) of the Decree.

3. Hazardous waste material is not stored in compliance with State Fire Marshal rules and regulations, in violation of Part II, Paragraph 7, of the Decree.

4. The cooling pond water must be properly disposed to prevent violation of Part II, Paragraph 18 of the Decree.

5. The barrel storage area lacks adequate aisle space, in violation of Part II, Paragraph 19(B) of the Decree.

6. Some barrels are in improper containers, in violation of Part II, Paragraph 19(H) of the Decree.

7. Said Defendants have failed to comply with other parts of the Consent Decree and with State law and regulation.

8. ECC is presently not in compliance with said Decree despite the efforts of this Court's Receiver to remedy the non-compliances.

NOW THEREFORE, IT IS HEREBY DECREED AND ORDERED that the Receiver shall:

(1) Immediately impose a ban on ECC receiving any hazardous waste material for treatment, storage or disposal.

(2) Immediately proceed to liquidate ECC and close its hazardous waste facility, pursuant to 320 IAC 4-7-1, and in a manner that:

(a) Controls, minimizes or eliminates to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground or surface waters or to the atmosphere.

(b) Minimizes the need for further maintenance.

(3) File with this Court, within thirty (30) days, a plan to close ECC's hazardous waste facility pursuant to 320 IAC 4-7-1.

(4) File with this Court, within forty-five (45) days, a plan to provide for financial assurance for facility closure pursuant to 320 IAC 4-7-2. Said plan shall include in addition to the requirements of 320 IAC 4-7-2:

(a) A list of all employees proposed to be retained by the Receiver, each employee's proposed job description, and each employee's proposed salary.

(b) Receiver's plan to fund said financial assurance plan.

(5) File with this Court, within sixty (60) days, a detailed report of the amount and purpose of all funds spent from the Receivership Trust Account, pursuant to Part II, Paragraph 4 of the Decree.

(6) Impliment the closure plan, and plan to provide for financial assurance, only after such plans have been approved by the Court and appropriate state agencies.

(7) File with this Court monthly status reports of the closure, commencing thirty (30) days after the closure plan has been approved by the Court.

(8) File with this Court, prior to release from bond, a Final Report of Closure, which Report shall include a certification of closure, pursuant to 40 CFR 265.115; a post-closure care and use of property plan, approved by the appropriate state agencies, pursuant to 40 CFR 265.117; a survey plat, pursuant to 40 CFR 265.119; a deed to the property of ECC, pursuant to 40 CFR 265.120; and any other document required by 320 IAC 4-7-1 and 320 IAC 4-7-2 that the Receiver deems necessary to show that he has complied with said regulations. In addition, the Receiver in said Final Report shall certify that the aforementioned documents have been submitted or recorded with the appropriate official, agency or person.

(9) This Order shall not alter or supercede the Court Order, in this cause, of July 1, 1981, except where said Order of July 1, 1981 is inconsistent with this Order.

(10) This Order shall apply to Environmental Conservation and Chemical Corporation, formerly Enviro-Chem Corporation, its employees, successors in interest, agents and assigns, and any person or persons acting through it, or on its behalf, and all other parties to this cause.

DATED: _____

Ronald E. Drury
Judge, Boone Circuit Court

Copies to all attorneys of record.

may 5, 1982

STATE OF INDIANA)
COUNTY OF BOONE) SS:

IN THE BOONE CIRCUIT COURT
CAUSE NO. C81-131

ENVIRONMENTAL MANAGEMENT BOARD
OF THE STATE OF INDIANA,

Plaintiff,

v.

ENVIRO-CHEM CORPORATION,
JONATHAN W. BANKERT and
PATRICIA BANKERT,

Defendants.

PLAINTIFF'S VERIFIED PETITION TO CLOSE
ENVIRO-CHEM CORPORATION AND ENVIRONMENTALLY SECURE SITE

Comes now Plaintiff, Environmental Management Board

of the State of Indiana, by Ralph C. Pickard, Technical Secretary, and by Linley E. Pearson, Attorney General of Indiana, by Phillip B. Rarick, Deputy Attorney General and petitions the Court to direct its Receiver to close Environmental Conservation and Chemical Corporation, formerly Enviro-Chem Corporation (hereinafter identified as ECC), and environmentally secure this corporation's hazardous waste facility site. The reason for this petition is that ECC, Jonathan W. Bankert, and Patricia Bankert have failed to comply with the terms of the Consent Decree approved by this Court on July 1, 1981. More specifically, Petitioner alleges:

1. ECC has failed to remove the sludge and contaminated soil in the pit immediately north of the cooling pond, in violation of Part II, Paragraph 5 of the Decree.
2. ECC has approximately 14,000 barrels containing incoming material for recovery and non-recoverable waste which are stored in violation of Part II, Paragraphs 6(B) and 6(C) of the Decree.
3. Hazardous waste material is not stored in

compliance with State Fire Marshal rules and regulations, in violation of Part II, Paragraph 7, of the Decree.

4. The cooling pond water must be properly disposed to prevent violation of Part II, Paragraph 18 of the Decree.

5. The barrel storage area lacks adequate aisle space, in violation of Part II, Paragraph 19(b) of the Decree.

6. Some barrels are in improper containers, in violation of Part II, Paragraph 19(h) of the Decree.

7. Said Defendants have failed to comply with other parts of the Consent Decree and with State law and regulation.

8. ECC is presently not in compliance with said Decree despite the efforts of this Court's Receiver to remedy the non-compliances.

9. On December 29, 1981, the Receiver for ECC filed with this Court an Amended Quarterly Report, which report noted most of the above mentioned violations, explained the Receiver's difficulty in meeting certain deadlines, and set forth his plan for removing the non-compliances, including a schedule for reducing the barrel inventory. Approximately mid-January, 1982 it became apparent said schedule would not be achieved.

10. By letters of January 18, 1982 and February 15, 1982, Linley E. Pearson, Attorney General of Indiana, requested the Receiver to impose a freeze on all incoming barrels to ECC. Pursuant to these requests, the Receiver imposed such a freeze on March 1, 1982.

11. On March 23, 1982 the Receiver filed a report to this Court lifting said freeze commencing March 22, 1982.

12. By letter of March 30, 1982, Plaintiff's counsel notified the Receiver of his objections to said Receiver's Report of March 23, 1982.

13. On or about April 13, 1982, the Receiver orally

notified counsel for Plaintiff that ECC lacked the long term fiscal viability to reduce its drum inventory to the stage where all drums would be stored in compliance with the Decree.

14. Pursuant to the Receiver's representations, it now appears there is reasonable cause to believe ECC will not be able to achieve compliance with the Decree in the immediate future.

WHEREFORE, Plaintiff prays that the Receiver be directed to:

(a) Immediately impose a ban on ECC receiving any hazardous waste material for treatment, storage or disposal.

(b) Immediately proceed to liquidate ECC and close its hazardous waste facility, pursuant to 320 IAC 4-7-1, and in a manner that:

[1] Controls, minimizes or eliminates to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground or surface waters or to the atmosphere.

[2] Minimizes the need for further maintenance.

(c) File with this Court, within thirty (30) days, a plan to close ECC's hazardous waste facility pursuant to 320 IAC 4-7-1.

(d) File with this Court, within forty-five (45) days, a plan to provide for financial assurance for facility closure pursuant to 320 IAC 4-7-2. Said plan shall include, in addition to the requirements of 320 IAC 4-7-2:

[1] A list of all employees proposed to be retained by the Receiver, each employee's proposed job description, and each employee's salary.

[2] Receiver's plan to fund said financial assurance plan.

(e) File with this Court, within sixty (60) days, a detailed report of the amount and purpose of all funds spent from the Receivership Trust Account, pursuant to Part II, Paragraph 4 of the Decree.

(f) ^{se}Impliment the closure plan, and plan to provide C for financial assurance, only after such plans have been approved by the Court and appropriate state agencies.

(g) File with this Court monthly status reports of the closure, commencing 30 days after the closure plan has been approved by the Court.

(h) File with this Court, prior to release from bond, a Final Report of Closure, which Report shall include a certification of closure, pursuant to 40 CFR 265.115; a post-closure care and use of property plan, approved by the appropriate state agencies, pursuant to 40 CFR 265.117; a survey plat, pursuant to 40 CFR 265.119; a deed to the property of ECC, pursuant to CFR 265.120; and any other document required by 320 IAC 4-7-1 and 320 IAC 4-7-2 that the Receiver deems necessary to show that he has complied with said regulations. In addition, the Receiver in said Final Report shall certify that the aforementioned documents have been submitted or recorded with the appropriate official, agency, or person.

Respectfully submitted,

ENVIRONMENTAL MANAGEMENT BOARD
OF THE STATE OF INDIANA

By:

Ralph C. Pickard
Technical Secretary

VERIFICATION

I, Ralph C. Pickard, being first duly sworn upon my oath, depose and say that I am the Technical Secretary of the Indiana Environmental Management Board, and that I have read the foregoing Plaintiff's Verified Petition to Close Enviro-Chem Corporation and Environmentally Secure Site, and that the matters set out herein are true and accurate to the best of my knowledge and belief.

Ralph C. Pickard
Technical Secretary

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

SUBSCRIBED AND SWORN to before me, a Notary Public,
in and for said County and State this ____ day of April, 1982.

Notary Public
Residence:

My Commission Expires:

Phillip B. Rarick
Deputy Attorney General
Office of the Attorney General
219 State House
Indianapolis, Indiana 46204
Telephone: (317) 232-6195

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing PLAINTIFF'S VERIFIED PETITION TO CLOSE ENVIRO-CHEM CORPORATION AND ENVIRONMENTALLY SECURE SITE was deposited in the U.S. Mail, first class, postage prepaid, on this _____ day of April, 1982, addressed to:

Mr. Warren D. Krebs
PARR, RICHEY, OBREMSKEY
& MORTON
225 West Main Street
P.O. Box 666
Lebanon, Indiana 46052

Mr. Halbert W. Kunz
KUNZ & KUNZ
320 N. Meridian Street
Rm. 528
Indianapolis, Indiana 46204

Mr. Gary Watson
Attorney at Law
P.O. Box 110
Lebanon, Indiana 46052

Phillip B. Rarick
Deputy Attorney General

STATE OF INDIANA)

COUNTY OF BOONE)

) SS:

IN THE BOONE CIRCUIT COURT

CAUSE NO. C81131

ENVIRONMENTAL MANAGEMENT BOARD
OF THE STATE OF INDIANA,
Plaintiff,

vs.

ENVIRO-CHEM CORPORATION, JONATHAN W.
BANKERT and PATRICIA BANKERT,
Defendants.

FILED

MAY 7 - 1982

Jean Caldwell
CLERK BOONE CIRCUIT COURT

PHASE I OF CLOSURE PLAN

Comes now the Court's Receiver, GARY L. WATSON, and files

— Phase I of the Closure Plan for Enviro-Chem Corporation
pursuant to the Court's order of May 5, 1982.

Phase I only deals with drum removal.

I. Recyclable Solvents and Salable Material

Drums containing recyclable solvents will be processed to
the extent possible, given to company's limited resources.
Estimated drum reduction: 2,000
Period: Two weeks

Drums containing material directly salable to other
processors for recycling will be sold. Proper permits for
transfer of such material will be obtained from the State of
Indiana.

Estimated drum reduction: 1,000
Period: Three weeks

II. Material Transferred To Tank Storage

Bulk storage exists on-site for approximately 2,000 drums.
This bulk storage will be used by pumping drummed material into
that storage. Bulk storage is environmentally preferred to drum
storage.

Period: Four weeks

III. Remaining Drums.

All remaining drums will be disposed of pursuant to 32 IAC 4-7-1 and any other applicable Federal or State Regulations.

It is expected that removal of these drums, which could involve generators and/or the landowner, will take six months. A drum list is attached hereto.

IV. Completed Closure Plan.

The completed closure plan, pursuant to the Order of the Court, will be filed within 30 days of the date of the Order.

Respectfully submitted,

Gary L. Watson, Receiver

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing plan was sent by first class United States mail, postage paid on the 7th day of May, 1982 to the following individuals:

Mr. Phillip Rarick
Deputy Attorney General
Office of the Attorney General
State of Indiana
Room 219, State House
Indianapolis, Indiana 46204

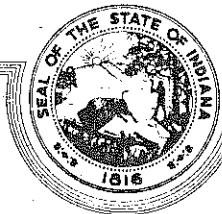
Mr. Ralph C. Pickard
Technical Secretary
Environmental Management Board
of the State of Indiana
1330 West Michigan Street
P.O. Box 1964
Indianapolis, Indiana 46206

Mr. Roy Strong
President and Director
Enviro-Chem Corporation
865 South State Road 421
Zionsville, Indiana 46077

Mr. Warren Krebs
Parr, Richey, Obremskey
& Morton
225 W. Main Street
P.O. Box 666
Lebanon, Indiana 46052

Mr. Thomas L. Mattix
Kunz & Kunz
320 N. Meridian Street
Suite 528
Indianapolis, Indiana 46204

Gary L. Watson, Receiver



INDIANAPOLIS, 46206

ENVIRONMENTAL MANAGEMENT BOARD

1330 West Michigan Street
P. O. Box 1964

MAY 19 1982

Mr. Gary Watson
Attorney at Law
P.O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: April 20, 1982, Inspection of the
Environmental Conservation and Chemical
Corporation

This letter will confirm the April 20, 1982, inspection of the Environmental Conservation and Chemical Corporation by J. Thomas Fitch, Division of Land Pollution Control. At that time, Mr. Fitch met with Bill Weddle to inspect the facility.

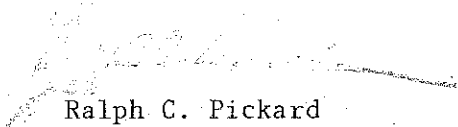
Mr. Weddle related to Mr. Fitch that he and Tom Mahorn had tested the Scot Air Packs at the facility. Mr. Mahorn is a volunteer fireman and is knowledgeable in these matters according to Mr. Weddle. Mr. Weddle stated that he had not yet completed the written testing and maintenance procedures for emergency and safety equipment as required by 40 CFR 265.33 and IAC 4-6-1. The water tower is still not functional, therefore, the cooling pond is still used to supply water for the processing stills.

There was still contaminated water found between the concrete curb on the east side of the south lot concrete storage pad and the earthen dike. This waste shall be eliminated from this area. There was an oil slick on the cooling pond as noted in earlier correspondence. Some of the oil was entering the cooling pond via a small eroded ditch between the northpit and the cooling pond. This small ditch is to be eradicated.

During the week of April 12, there was an increase of 79 barrels on-site. No records were available for the volume of wastes in bulk storage. There was storage of barrels in standing water throughout much of the south lot and north lot storage areas. Storage of barrels in water will increase the amount of contaminated water and will increase the deterioration rate of the barrels.

The solids and liquids processing area was under one to two foot of water. It was also noted that there was a layer of ink wastes on top of the water. This water must be eliminated before processing can proceed in this area.

Very truly yours,

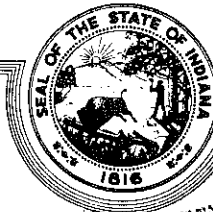

Ralph C. Pickard
Technical Secretary

JTF/tr

cc: Mr. Richard Shandross, U.S. EPA
Mr. Phil Rarick, Deputy Attorney General
Mr. Roy Strong, ECC
Mr. Jim Wessel, ECC
Boone County Health Department
Boone County Circuit Court

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P.O. Box 1964

MAY 7 1982

RECEIVED
MAY 11 1982
WASTE MANAGEMENT BRANCH
EPA REGION V

Mr. Gary Watson, Attorney at Law
Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: April 13, 1982, Inspection of the
Environmental Conservation and
Chemical Corporation (ECC)

This letter confirms the April 13, 1982, inspection of the Environmental Conservation and Chemical Corporation. Mr. J. Thomas Fitch, Division of Land Pollution Control, met with Mr. William Weddle of the Environmental Conservation and Chemical Corporation.

Mr. Fitch presented to Mr. Weddle an evaluation of the Environmental Conservation and Chemical Corporation's compliance with the Agreed Order signed with the Attorney General's Office, July 1981. Mr. Weddle was to review this document and then present it to you for your review. Mr. Fitch was presented with a copy of the "Material Identification and Location Report" completed by Jeffrey S. Northrup of ECC.

Messrs. Fitch and Weddle then conducted an inspection of the storage facility. It was again noted that much of the barrel storage areas were under two to eight inches of water. Much of the water has been contaminated by leaking barrels of waste (i.e., oils, solvents, pigments). Mr. Fitch was especially concerned with the contaminated water found between the curbed concrete storage pad and the earthen dike in the south lot area. All contaminated water should be treated and disposed of in an environmentally safe manner. Again, Mr. Fitch was presented with reports noting the numbering of barrels received by ECC and those processed and readied for disposal. This document was for the week of April 5, 1982, this report shows that there was an increase of barrel storage during that week. The increase was 61 barrels.

Mr. Weddle explained that the newly erected cooling water tower is still inoperable. The tower may need to come down so that repairs can be initiated. This will delay the partial/total elimination

of the existing cooling pond. Mr. Fitch noted that there was a discoloration of grass growing on the west embankment surrounding the facility. Mr. Fitch was told that boiler blow down was sprayed onto the embankment causing this discoloration. Mr. Fitch was assured that this would not happen again.

Very truly yours,

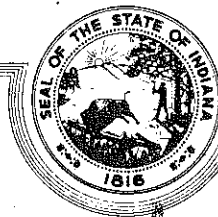
~~Ralph C. Pickard~~
Technical Secretary

JTF/jb

cc: Mr. Richard Shandross, U.S. EPA, Region V ✓
Phil Rarick, Deputy Attorney General
Boone County Health Department
Roy Strong, ECC

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

April 22, 1982

Mr. Gary Watson
Attorney at Law
P.O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: April 1, 1982, Inspections
of the Environmental Conservation
and Chemical Corporation (ECC)

On the above-referenced date, Mr. J. Thomas Fitch, Division of Land Pollution Control, met with Mr. Bill Weddle to inspect the Environmental Conservation and Chemical Corporation facility. Messrs. Fitch and Weddle reviewed progress made in achieving compliance with the Consent Decree and conducted an inspection of the facility.

The following is an evaluation of the progress made by ECC:

Item 5 - The contaminated soil and sludge located in the north pit area has not been removed for disposal. The soil and sludge has thawed and can be removed. The waste in question was under 12-18 inches of surface water. Before the waste can be disposed of, ECC must apply to this agency to secure an approval for disposal. This waste was to have been disposed of by November 1, 1981. This agency sees no reason why it cannot be disposed of immediately. This item is not in compliance.

Item 6B - On March 18, 1982, Messrs. Fitch and Langlotz conducted an inventory of the barrels on-site. The barrel count was 24,000. There are approximately 10,000 barrels stored on the concrete storage pad and 14,000 barrels are stored off the pad. By November 1, 1981, ECC was to have all barrels of incoming non-processed wastes stored on a curbed non-reactive impermeable pad. This item, therefore, is not in compliance. To achieve compliance, the barrel inventory must be reduced, rather than constructing more storage pads.

Item 11 - Mr. Weddle spoke to Mr. Fitch concerning the treatment of contaminated surface water run-on and rainwater. At this time, the contaminated water is phase separated. The more contaminated water is processed through a thin film evaporator still. The condensate is pumped into the cooling pond. Samples of the cooling pond water are taken and analyzed weekly. Results of these tests are on file in the ECC laboratory. Mr. Weddle and Tony Clark are to speak to staff concerning the possibility of securing a permit to spray irrigate processed water and cooling pond water. After staff has made a decision on this matter, you will be contacted.

Item 14 - Mr. Fitch was informed that an inventory of shipments on-site in storage has been completed. Locations of shipments on-site have been noted on a chart in the laboratory. A notebook stating the locations of shipments is also on hand in the lab. Mr. Weddle is to make copies of both documents and present these to Mr. Fitch the week of April 15, 1982. The barrels have yet to be color coded for flammability classification. Until this has been completed, this item will not be in compliance.

Item 18 - The cooling tower has been erected. It is not functional due to a leaking problem. Once the tower is functional, the cooling pond will not be needed to supply cooling water to the stills. Therefore, the pond could be backfilled and secured. Mr. Weddle wishes to backfill and secure one-half of the pond, using the other half for fire fighting and a secondary cooling water source. Before staff can approve such a request, soil borings of the pond bottom must be taken and evaluated. It is recommended that Mr. Weddle meet with Ms. Karyl Schmidt, staff geologist, to discuss this plan. Since the cooling pond has not been secured or eliminated, this item has not achieved compliance.

Item 19 (b) - Aisle space was still nonexistent in barrel storage areas other than the concrete storage pad. Until barrel inventory is reduced, this item will not achieve compliance.

Item 19 (h) - There are popped-top, open-lidded (bungless), leaking and damaged barrels on-site. Since, these types of containers exist at the facility, this item has not achieved compliance.

Also, Mr. Weddle has not yet completed a testing and maintenance program for emergency and safety equipment as required by 40 CFR Section 265.33.

During Mr. Fitch's inspection of the site, the following was noted:

1. There was a small oil slick on the cooling pond. The oil shall be cleaned up immediately.
2. There was contaminated melted snow/rainfall throughout much of the storage areas. There was contaminated water between the concrete and earthen dikes in the south lot area. This water shall be processed first, followed by the other areas. Photographs were taken to document this problem. Once a spill or leaking barrel of waste has contaminated on-site water, the water shall be cleaned-up in accordance with ECC's contingency plan.
3. It was noted that some barrels had been cleared from the west side of the processing building. Please continue to achieve reduction in the number of barrels on-site.

Mr. Fitch was given documents noting the number of barrels received and processed for the weeks of March 22 and 29. He was also given documents which noted the number of storage tanks on-site and the volume of waste in each tank. Such documents shall be kept on-file at the facility and copies sent to this agency.

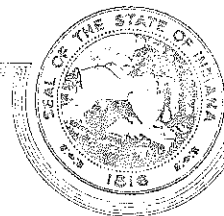
Sincerely,



Ralph C. Pickard
Technical Secretary

cc: Mr. Richard Shandross ✓
Mr. Phil Rarick
Attorney General's Office
Boone County Health Department
Boone County Circuit Court
Mr. Bill Weddle, ECC
Mr. Roy Strong, ECC

STATE OF INDIANA



INDIANAPOLIS, 46206

ENVIRONMENTAL MANAGEMENT BOARD

1330 West Michigan Street
P. O. Box 1964

Mr. Gary Watson, Attorney at Law
Box 110
Lebanon, IN 46052

APR 15 1982

Dear Mr. Watson:

Re: Barrel Inventory Conducted
March 18, 1982, at the Environmental
Conservation and Chemical Corporation

On the above-referenced date, Messrs. Lee Langlotz and J. Thomas Fitch, Division of Land Pollution Control, conducted an inventory of non-processed barrels of waste stored at the Environmental Conservation and Chemical Corporation facility. Mr. Langlotz was accompanied by Mr. Tom Mahorn, Plant Manager, and Mr. Fitch was accompanied by Mr. Bill Weddle, Safety and Environmental Manager. Messrs. Weddle and Fitch counted the barrels north of the cooling pond and Messrs. Mahorn and Langlotz counted those to the south of the cooling pond. The total number of non-processed barrels on-site was found to be 24,000. This figure was agreed to by all parties involved.

Please ensure that the Environmental Conservation and Chemical Corporation operating record reflects this number for barrels stored at the facility, it shall be used to determine future progress achieved at this facility.

Very truly yours,

Ralph C. Pickard
Technical Secretary

JTF/tr

cc: Mr. Richard Shandross, U.S. EPA ✓
Mr. Phil Rarick, Attorney General's Office
Mr. Roy Strong, ECC
Mr. Bill Weddle, ECC
State Fire Marshal's Office
Boone County Health Department
Northside Sanitary Landfill
Attn.: Mr. John Bankert, Sr.

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

April 8, 1982

Mr. Gary Watson, Attorney at Law
Box 110
Lebanon, IN 46052

APR 08 1982

Dear Mr. Watson:

Re: Inspection of the Environmental
Conservation and Chemical Corporation
(ECC) Conducted March 9, 1982

On March 9, 1982, Mr. J. Thomas Fitch and Ms. J. R. Ketrow, Division of Land Pollution Control, met with Mr. Bill Weddle. The purpose of the inspection was to determine if ECC had come into compliance with all violations noted in our February 10, 1982, correspondence. The status of the violations were as follows:

Consent Decree Part II

Item 5

The contaminated soil and sludge in the north pit area cannot be removed at this time. The soil and sludge are frozen and lie beneath four inches of ice. Further testing of this material is felt to be unnecessary. The waste shall be removed as soon as it has thawed. The approval for disposal of this waste must be secured from the Environmental Management Board prior to disposal.

Item 6b

This item is still in violation since all barrels are not stored on the concrete storage pad as required.

Item 13

At this time, shipments of waste sent off-site are to be tested for EP Toxicity and flashpoint. This, along with the knowledge of the waste received from the generator of the waste through

the work product record system, should give ECC the information they need to adequately identify the waste which they generate. Therefore, this item is felt to be in compliance at this time.

Item 14

The internal record keeping for the identification of incoming materials and those already on-site has not yet been completed. Therefore, this item is not in compliance.

Item 18

The cooling tower has been erected. It was not operational at the time of the inspection. The plant manager stated that the cooling tower should be in operation the week of March 15, 1982. Staff is reviewing the proposal made by ECC to backfill the eastern half of the present cooling pond so that it can be used as an auxiliary water supply. Before a decision could be made on this matter, ECC must prove that the bottom of the cooling pond is secure (free of sand lenses). ECC would also need to secure approval for the disposal of contaminated soil at the bottom of the cooling pond.

Item 19b

Aisle space is still absent in areas of storage other than the concrete storage pad. Mr. Weddle did state that a roadway throughout the processing area is to be cleared. This action would not necessarily achieve compliance with this item, but would improve the existing situation.

Item 19g

Daily and weekly inspections are now completed as required. Mr. Weddle had completed inspections throughout February and the beginning of March. As stated previously, the inventory of wastes on-site has not yet been completed. Until this inventory is complete, and locations of wastes documented, this item will not be in compliance.

Item 19h

Damaged barrels of waste have not been transferred to barrels in good condition. Therefore, this item is not in compliance.

Item 11

Mr. Weddle informed us that the spill material and contaminated rainwater collected are phase separated. The contaminated water

may further be treated by running it through the thin film evaporator. The collected wastes are processed through the stills. This item will be closely monitored before a final disposition is made.

Concerning violations of RCRA rules and regulations noted in the February 10, 1982, correspondence, the following was found:

Items 1, 2, and 3 are in compliance. These concern the inspection of safety and emergency equipment, security devices, and operating and structural devices.

Item 4 is in compliance. This item concerned logging of the above inspections in a log book.

Item 9 concerning the testing and maintenance of emergency equipment is not yet complete. Mr. Weddle is still assimilating information concerning the proper testing of certain emergency equipment. Ms. Ketrow was asked to help Mr. Weddle in this task.

Item 10 concerning adequate aisle space was addressed earlier. This is not in compliance at this time.

Items 11, 12, and 13 concerning the operating record are felt to be in compliance at this time. Those items concern the inspection of the facility since these inspections are now complete. These items are felt to be in compliance.

Items 14, 15, 16, and 17 have to do with the improper storage of wastes in containers. Since all containers in the facility are not in good condition, these items are still in violation.

Items 18 and 19 have to do with the inspection of containers and tanks. Since these inspections are now conducted, these items are felt to be in compliance.

During the week of March 15, 1982, you and Mr. Phil Rarick of the Attorney General's Office were to meet and discuss the above-noted violations. You are to have completed a document noting why ECC was in violation of the Consent Decree, how they will achieve compliance, and timetables for achieving compliance. You are also to submit another document concerning the reduction of the barrel inventory. Again, this report will document the number of barrels on-site, a reduction strategy

Date: MAR 31 1982

Subject: Reports on Damages Due to Incidents
at Two Recycling Facilities

From: Richard Shandross
Environmental Engineer

To: Matthew A. Straus, Manager
Hazardous Waste Definition Program

Thru: Karl J. Klepitsch, Jr., Chief
Waste Management Branch

140084259951

As we discussed on March 2, 1982, Region V has recently seen several cases where accidents have occurred at recycling facilities which are partially unregulated under current RCRA Subtitle C regulations. You indicated that you would be interested in receiving reports on these damage incidents to support upcoming changes to the regulation. Therefore, I am forwarding to you reports of incidents which occurred at Enviro-Chem Corp. in Zionsville, Indiana and at SEPOA in East Chicago, Indiana. The former incident more properly belongs within the jurisdiction of OSHA, although materials management in general at this facility is very poor; the latter incident appears to be outside of the jurisdiction of RCRA Subtitle C regulations due to the exclusion of 40 CFR 261.6. Both facilities are of course recycling plants.

I hope these will be of some use to you. Feel free to call me at FTS-886-6146, if you have any questions concerning the specifics of these incidents.

Enclosures

R. SHANDROSS:gigi:6-7444:3/31/82:5-HW-TUB



environmental conservation & chemical corporation

865 South U.S. 421 Zionsville, Indiana 46077 (317) 769-6153

RECEIVED
MAR 17 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

March 13, 1982

IND0084259951

U. S. Environmental Protection Agency
230 South Dearborn
Chicago, Illinois 60604

ATTN: Richard Shandross

Re: 40 CFR, 265.56 (j), Contingency Plan Implementation Report

Dear Mr. Shandross:

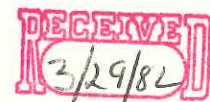
The following is a written report of a spill incident requiring implementation of the Contingency Plan for Environmental Conservation & Chemical Corporation (formerly Enviro-Chem Corporation).

265.56 (j)

1. Roy M. Strong, President
865 South US 421
Zionsville, Indiana 46077
2. Environmental Conservation & Chemical Corporation
(formerly Enviro-Chem Corporation)
865 South US 421
Zionsville, Indiana 46077
- 3.-7. February 26, 1982, at 5:00 p.m., a D-9 Bulldozer from the Northside Sanitary Landfill struck and put a small gash in the front compartment of a loaded tanker. The Spill Plan ("Dangerous") from our Contingency Plan was immediately put into effect. The unnamed stream that flows nearby was protected by building a dike with a grader and by digging a pit within the diked area with a backhoe. Sand, straw and absorbant sausages were placed around the area for further containment.

Approximately 700 gallons of liquid were spilled (see attached Laboratory Analysis) on the ground and another 1,300 gallons were pumped into another tanker. There were no injuries and all human and environmental hazards were contained within an area measuring 45' x 15'. Approximately 500 gallons of the spilled liquid was pumped up using a vacuum trailer normally used for pumping this type of liquid. Roughly, another 200 gallons of liquid were soaked up into and recovered with an estimated 25 cubic yards of dirt, straw and sand. All of the

- 1 -



U.S. Environmental Protection Agency,
Richard Shandross
March 12, 1982

contaminated solid materials were placed into the ECC solidification handling area where hazardous solids are handled on a routine basis. The 1,800 gallons of recovered liquid were pumped into a tank normally used for storing this type of material until processing.

If any further information is required please contact me, Bill Weddle, at (317) 769-6153.

Sincerely,
ENVIRONMENTAL CONSERVATION & CHEMICAL

A handwritten signature in cursive script that reads "William L. Weddle, Jr.".

William L. Weddle, Jr.,
Environmental, Safety & Transportation Director

WLW:sar

Enclosure

FEB 10 1982

SAH/M

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Roy Strong, President
Enviro - Chem Corporation
865 South State Road 421
Zionsville, Indiana 46077

RE: Enviro - Chem Corporation
865 S. State Road 421
Zionsville, Indiana 46077
IND084259951

Dear Mr. Strong:

By now you should have received an acknowledgement of our receipt of your Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation & Recovery Act, as amended (RCRA) permit program. You should also have been apprised of your condition relative to interim status.

Accordingly, this letter constitutes the next step in the formal process leading to issuance or denial of an RCRA permit. Under the authority of 40 CFR 122.22, this is a formal request for submittal of Part B of your application for the above-referenced facility.

Enclosed is a copy of 40 CFR 122.25 which lists the items that constitute Part B for your facility. Your Part B application must be submitted in quadruplicate and postmarked no later than August 18, 1982. Please send your application to the following address:

RCRA ACTIVITIES
Part B Permit Application
USEPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

While your complete application is due no later than the above date, you are encouraged to submit at your earliest opportunity those components which have been completed. Several interim status documents also are used as components of your Part B application. Included are such items as your waste analysis plan, contingency plan, closure plan, etc., each of which may be submitted to this office immediately, to initiate the processing of your Part B application.

Failure to furnish your complete Part B application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 122.22.

Information you submit in the Part B application can be disclosed to the public, according to the Freedom of Information Act and U.S. Environmental Protection Agency (USEPA) Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. USEPA will review business confidentiality claims under regulations at 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

We have also enclosed a copy of 40 CFR Part 264 which includes technical standards for the operation of treatment and storage facilities. These standards will become applicable upon issuance of a permit to your facility by USEPA.

We will coordinate review of your application with the Indiana State Board of Health and if your application is acceptable, will strive for a simultaneous issuance of Federal and State hazardous waste facility permits. It is possible that during the processing of your application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and the State in lieu of USEPA will make the final determination on your application.

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently I suggest you contact Mr. Richard Shandross, of my staff at (312) 886-6146, as you begin preparing your application. Mr. Shandross will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

We look forward to receiving your Part B application.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

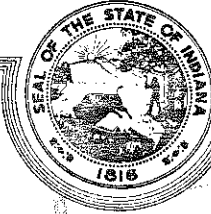
Enclosures: 40 CFR 122.25
40 CFR 264

cc: David Lamm, ISBH

bcc: Part A File
Richard Shandross

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P.O. Box 1964

February 10, 1982

Mr. Gary Watson
Attorney at Law
Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: Inspection of the Environmental
Conservation and Chemical Corporation (ECC)
Conducted January 25 and January 28, 1982

Since you were not able to be present during the above-referenced inspection, it is felt that you should be informed of the results of that inspection. This letter is written to confirm those results.

On January 25, 1982, Mr. J. T. Fitch, Division of Land Pollution Control, met with Messrs. Bill Weddle and Tony Clark of ECC. The purpose of this meeting was two-fold. First, Mr. Fitch wished to stress the importance and necessity of properly identifying wastes sent off-site for disposal. They discussed five shipments of wastes which had been sent to the Four County Landfill for disposal. As in the past, these shipments were manifested as being still bottom wastes. The hazardous waste manifest identified these wastes using the EPA identification number F003. This is the same designation used in the past to identify drum bottom wastes generated by ECC (see January 8, 1982, correspondence). Mr. Clark was questioned as to whether or not there was documentation on record at ECC which would prove that these wastes had been properly manifested. Mr. Clark presented Mr. Fitch with manifests from the original generators, lab analyses of these wastes, and work product records indicating that the wastes had indeed been properly identified. Mr. Fitch explained that these records must be kept on file, and that future records must be kept by ECC indicating that shipments off-site have been properly identified. Mr. Fitch further stated that shipments of wastes sent to Four County Landfill must be accompanied by both a manifest and a copy of the lab analysis for the waste shipped. Mr. Jim Wilkens, operator of the Four County Landfill, was instructed not to accept any shipments which are not accompanied by both documents.

Secondly, Mr. Fitch discussed with Messrs. Weddle and Clark violations of the Consent Decree which ECC is currently working under. Those violations are the following:

Part II

1. Item 5 - The contaminated soil and sludge has not been removed from the north pit area. This waste was to have been disposed of by November 1, 1981. Due to problems associated with the

RECEIVED
FEB 17 1982
WASTE MANAGEMENT BRANCH
EPA REGION V

sampling and testing of the waste, this deadline was not met. To further complicate matters, there was a disagreement as to the definition of an ignitable waste. This was an extremely important point because the State of Indiana will not grant an approval to dispose an ignitable waste in a landfill. This matter was clarified in a December 17, 1981, conversation between Mr. Fitch and Mr. Shandross of Region V, EPA. It has been determined that this waste is hazardous by definition, but is not an ignitable waste. The problem lies in the fact that ECC has an obligation to communicate to the Environmental Management Board and the Attorney General if they are not able to meet any deadlines of the Consent Decree, Part II, Item 10. No effort was made.

2. Item 6B - This item states that as of November 1, 1981, storage of all barrels containing incoming materials for recovery shall be on a curbed non-reactive impermeable base consisting of concrete. This item of the Consent Decree has not been realized. As of January 28, 1982, there were over 17,000 barrels of recoverable materials not stored on the above-mentioned pad.
3. Item 13 - This item states that ECC shall provide the Environmental Management Board with a written report of its procedure for testing all incoming materials and the methods utilized by ECC to ensure that all materials are correctly identified for adequate handling, storage and disposal. This was to be completed by August 1, 1981. The report was submitted and reviewed by staff. If followed, the plan would have been adequate. It was not followed. This is apparent in that wastes shipped off-site (drum bottoms) were designated on the manifests as being still bottoms when they had never been processed. Testing of BP toxicity for ink and paint wastes was not addressed. These shipments were misrepresented.
4. Item 14 - This item states that a procedure for internal record-keeping for identification of all incoming materials and for locating all materials in storage will be provided by Enviro-Chem to the Environmental Management Board on or before August 1, 1981. Again, the problem lies not in that the plan is inadequate, but that it was not followed. Waste shipments were recorded in a log. The log showed the location of shipments received and combustibility classifications. The barrels were never color coded as outlined in the plan submitted, and when barrels were moved for the "Open House" last fall, the new locations were never recorded. Also, since there are no definite aiseways in many storage areas, it is difficult to determine where one shipment begins and ends. As in Item 13, the problem does not lie in the plan, but in the implementation of the plan.

5. Item 18 - This item states that ECC will secure all sides of the cooling pond to prevent any leaching or discharge from the pond by September 1, 1981. It was found that the cooling pond could not be secured to adequately ensure compliance with this item. It was agreed that a cooling tower would be erected and the cooling pond drained. A plan was submitted which stated that the cooling tower would be erected and functional by December 1, 1981. This goal was not realized. You submitted a revised goal of December 31, 1981. It is now February 5, 1982, and the cooling tower is yet to be erected.
6. Item 19 (b) - This item states that ECC should establish adequate aisle space to comply with 40 CFR 265.35. There is aisle space on the concrete storage pad but nowhere else. There are over 17,000 barrels stored off of this pad.
7. Item 19 (g) - This item states that an operating record will be kept by ECC so as to comply with 40 CFR 265.73. This item has not been realized. Daily and weekly inspections are not conducted as required for an operating log. The location of all wastes in storage are not adequately recorded, etc.
8. Item 19 (h) - This item states that all hazardous wastes shall be transferred from containers which are not in good condition or manage the waste in some other way that complies with the requirements of 40 CFR 265.173 and 40 CFR 265.171. On January 28, 1982, Mr. Fitch concluded that there were over 200 barrels on-site which were not in good condition.
9. Item 11 - This item states that any and all contaminated processed waste water, contaminated cooling water, rainwater collected within the diked and curbed areas, and any other contaminated water existing on-site will henceforward be disposed of at a facility that can provide adequate treatment or in a manner consistent with applicable standards of the Environmental Management Board and any of its designated agencies or boards. ECC shall submit to the Environmental Management Board applications for construction and operation for a biological waste water treatment and/or spray irrigation facility for its contaminated cooling water, rainwater, collected within diked and curbed areas and/or any other contaminated water.

Mr. Fitch has been informed on many occasions that contaminated rainwater/casual water is "phase separated" and the water is pumped into the non-secure cooling pond. It is his understanding that the oil/solvent is reclaimed. He is of the opinion that no testing is conducted to determine the effectiveness of this process. Also, the Environmental Management Board has not received a detailed explanation of the process so that it can be determined if the process is consistent with its applicable standards.

It is quite apparent that the Consent Decree has not achieved its goals of upgrading the operation and management of ECC. You shall submit a detailed explanation outlining why each of the above-mentioned items were/are not in compliance. Furthermore, this document shall detail steps that shall be initiated to achieve compliance, and a timetable for compliance. This shall be submitted to the Environmental Management Board, Attorney General, and the Boone County Circuit Court. In addition to this requirement, you shall explain your program to staff members of the Environmental Management Board and Attorney General. A meeting shall be set for the week of February 22, 1982.

Mr. Fitch has informed me that the barrel inventory has not been reduced as projected. In fact, the inventory has increased to over 26,000 barrels. In addition to the above report, you shall submit by February 22, 1982, a detailed plan for the reduction of the barrel inventory. This plan shall include a specific timetable with reduction goals noted. Again, this plan shall be presented to staff of the Environmental Management Board and Attorney General during the week of February 22, 1982.

On January 26, 1982, Mr. Fitch and Mr. Bill Weddle reviewed the progress which had been made in achieving compliance with violations noted during the November RCRA Interim Status Inspection. The following observations were made:

- | | |
|---------------------|--|
| 1. 40 CFR 265.15(b) | Owner or operator inspections do not include the inspection of safety and emergency equipment. |
| 2. 40 CFR 265.15(b) | Owner or operator inspections do not include the inspection of security devices. |
| 3. 40 CFR 265.15(b) | Owner or operator inspections do not include the inspection of operating and structural devices. |

These violations have not yet come into compliance.

The reason that these violations are not in compliance is that the inspection program has not been conducted on a regular basis. Mr. Weddle has developed an inspection program, but inspections were only conducted during three weeks of December 1981 and none during January of 1982. To fully comply with these requirements, inspections must be conducted as scheduled.

- | | |
|---------------------|---|
| 4. 40 CFR 265.15(d) | Owner or operator does not record inspections in an inspection log. |
|---------------------|---|

This item is still in violation because the inspections were not conducted as scheduled and therefore not recorded as required.

5. 40 CFR 265.15(d)(3) Personnel training records do not include a description of personnel training.

This violation is felt to be in compliance at this time. Mr. Weddle has instituted a personnel training program for new personnel. An indoctrination program is conducted with a testing program afterwards. Monthly "safety meetings" are to be conducted for continuing education of personnel. This will be monitored periodically for compliance.

6. 40 CFR 265.16(d)(4) Personnel training records do not include records of personnel training.

This item is felt to be in compliance at this time. Personnel attending indoctrination programs or continuing education classes are required to complete a test. They must sign these tests before they begin.

7. 40 CFR 265.17(a) "No Smoking" signs are not on premises where required.

This item is in full compliance.

8. 40 CFR 265.31 There is evidence of fire, explosion, or release of hazardous waste or hazardous waste constituents on premises which could threaten human health or the environment.

This violation is felt to be in compliance at this time. No major spills were noted during the inspection of the facility January 27 and 28, 1982.

9. 40 CFR 265.33 Owner or operator has not established testing and maintenance procedures for emergency equipment.

It is felt that this violation is not in compliance. An inspection program has been developed for these items, but a detailed testing and maintenance program has not yet been developed.

10. 40 CFR 265.35 There is not adequate aisle space for the unobstructed movement of personnel and emergency equipment.

This violation was addressed earlier in the discussion of Consent Decree violations. It is not in compliance.

11. 40 CFR 265.73(a) A written operating record is not maintained as required.

12. 40 CFR 265.73(b)(3) Records and results of all waste analyses, trial tests, monitoring data, and operator inspections are not found in the operating record.

13. 40 CFR 265.73(b)(5) The operating record does not include facility inspections.

Again, these violations have been previously addressed in the discussion of Consent Decree violations. They are not in compliance.

14. 40 CFR 265.171 Containers are not in good condition.
15. 40 CFR 265.172 Containers are not compatible with waste in them.
16. 40 CFR 265.173(a) Containers are not stored closed.
17. 40 CFR 265.173(b) Containers are not properly managed to prevent leaks.

These violations are not in compliance. During the barrel inventory conducted January 27 and 28, 1982, Mr. Fitch found the following:

1. Bungless and open top containers - 24
2. Leaking containers or those that had leaked - 94
3. Popped top containers - 54
4. Damaged or corroded containers - 53

18. 40 CFR 265.174 Containers are not inspected weekly for leaks and deterioration.

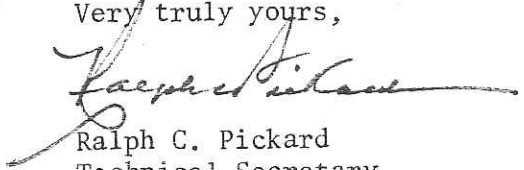
Again, this has been previously addressed.

19. 40 CFR 265.194 Required daily and weekly inspections are not conducted.

This violation was previously addressed.

As Receiver for ECC you were delegated the responsibility to see that the facility complied with the Consent Decree and the Regulations of RCRA relating to the Consent Decree. It is your responsibility to see that this Corporation is properly managed.

Very truly yours,


Ralph C. Pickard
Technical Secretary

JTFitch/mjh

cc: Hon. Linley Pearson, Attorney General
Mr. Phil Rarick, Deputy Attorney General
Mr. Roy Strong, ECC
Mr. Bill Weddle, ECC
Mr. Richard Shandross, U.S. EPA
Mr. Arnold Leder, U.S. EPA
Boone County Health Department
Boone County Circuit Court

Penny - file in Enviro Chem

092V-CCA:ss
11346

1 5 JAN 1982

Enviro-Chem Corporation
865 Route 461
Zionsville, Indiana 46077

Attention: Mr. Roy Strong

Dear Mr. Strong:

Between 7 January 1981 and 13 February 1981 your company received a total of seventy-nine drums of hazardous waste from the Naval Weapons Support Center, Crane, Indiana for treatment and disposal via our chemical disposal contractor, Broco, Inc. Although Crane received signed manifests indicating that your company accepted the waste for disposal, as its generator we are extremely interested in determining its current disposition.

It has been brought to our attention that several requests for this information from you by Broco, Inc., have gone unanswered. We are very concerned about the status of this waste since it has been over a year since your company received the first shipment.

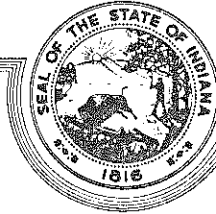
If it is currently in storage, we would appreciate a description of the storage conditions and a schedule and plan for the disposal of the waste. We would also like a formal notification of its ultimate disposal, providing a description of how each waste stream was treated or disposed.

All correspondence regarding this subject should be addressed to Commanding Officer, Naval Weapons Support Center (Code 092V), Crane, Indiana 47522.

Sincerely yours,

Blind copy to:
AROICC
Broco, Inc.
EPA Region V ←

J. D. FARIS
Manager, Engineering Division
Public Works Department
By direction of the
Commanding Officer



JAN 12 1982

Mr. Gary Watson
Attorney at Law
Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: Disposal of Contaminated Sludge
and Contaminated Soil in the
North Pit Area
Environmental Conservation and
Chemical Corporation

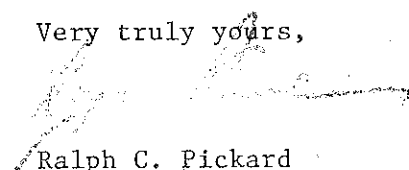
This letter is written to clarify an existing argument concerning the proper disposal of contaminated sludge and soil in the North Pit Area. As required by Part 2, Item 5, of the Consent Decree, the Environmental Conservation and Chemical Corporation is required to dispose of the above-referenced material.

Eight samples of this material were taken on October 6, 1981, by Mr. J. Thomas Fitch, Division of Land Pollution Control. The material was heated in the Indiana State Board of Health laboratories, and was found to emit vapors which were ignitable. There was some confusion as to whether this material could be classified as hazardous due to the characteristic of ignitability, 40 CFR 261.22. This is because the material is solid. It was agreed that the material is hazardous by definition because it has been contaminated by listed hazardous wastes, and it is a result of storage of hazardous waste Section 261.3 A2(ii) and 261.3 B2, respectively.

In a December 17, 1981, telephone conversation between Mr. Fitch and Mr. Richard Shandross, U.S. EPA, it was concluded that this waste is not an ignitable hazardous waste, but is a hazardous waste by definition.

With this question clarified, it is now felt that there is no reason why the material cannot be disposed of in an environmentally safe manner. Therefore, a plan for the disposal of this waste shall be submitted immediately to the Environmental Management Board.

Very truly yours,

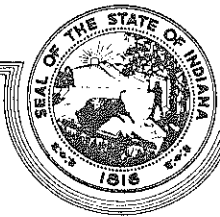

Ralph C. Pickard
Technical Secretary

TFitch/bo

cc: Richard Shandross, U.S. EPA ✓
Phil Rarick, Deputy Attorney General
Mr. Jim Wessel
Environmental Conservation and
Chemical Corporation
Mr. Roy Strong
Environmental Conservation and
Chemical Corporation
Mr. Bill Weddle
Environmental Conservation and
Chemical Corporation
Boone County Health Department

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

January 8, 1982

Mr. Gary L. Watson
Attorney at Law
Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: December 31, 1981, Inspection
of the Environmental Conservation
and Chemical Corporation (ECC)

On December 31, 1981, Messrs. J. Thomas Fitch and Lee Langlotz, Division of Land Pollution Control, conducted an inspection of the above-referenced facility. They met with Mr. Bill Weddle, Environmental and Safety Manager for Environmental Conservation and Chemical Corporation.

They first met to discuss progress made in achieving compliance with RCRA regulations and the Agreed Order. Again, Mr. Weddle was informed that all items noted as being out of compliance in the December 10, 1981, letter to you, must be complied with in 30 days. The date set for full compliance is January 13, 1982. This was discussed earlier with Mr. Jim Wessel, General Manager, after the inspection was completed and again with Mr. Weddle during an earlier meeting in December. Mr. Weddle asked what items were of greatest importance. He was informed that priority items are those directly involving the operation of the facility, but that all items are important. Mr. Weddle also asked how the contaminated sludge and soil in the "north pit" area should be manifested for disposal. This soil should be tested for its organic constituents, unless there is adequate knowledge as to the types of contaminants it contains. The sampling and test methods used should be recognized by the Environmental Protection Agency. This will allow the disposal facility to have adequate knowledge of the waste prior to disposal.

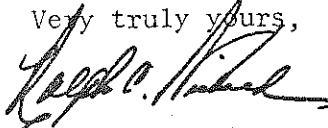
Mr. Weddle informed Messrs. Fitch and Langlotz that the barrel inventory would be reduced 4,000 barrels by January 16, 1982. This is to be accomplished by increasing processing and handling incoming wastes in bulk.

Mr. Weddle was informed that the approval to dispose of drum bottoms and still bottoms at the Four County Landfill may be revoked. This will be done if the manifests used during transportation do not properly identify the wastes generated at Environmental Conservation and Chemical Corporation. The waste is now manifested as being still bottoms, but are drum bottoms. This will not be tolerated any longer. The wastes should be tested to determine the characteristics of the wastes. Sampling and testing methods used should be recognized by the Environmental Protection Agency.

Mr. Gary Watson

During the inspection of the facility it was noted that there are no barrels of wastes stored off-site. Also, there is improved access to barrels located near the north boundary of the facility.

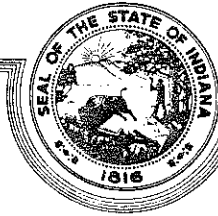
Very truly yours,



Ralph C. Pickard
Technical Secretary

JTFitch/mjh

cc: Mr. Bill Weddle, ECC
Mr. Roy Strong, ECC
Boone County Health Department
Mr. Phil Rarick, Deputy Attorney General
Mr. Richard Shandross, EPA ✓



December 31, 1981

Mr. Gary Watson
Attorney at Law
Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: December 15, 1981 Inspection
of the Environmental Conservation
and Chemical Corporation

This letter is written to confirm the December 15, 1981, inspection of the Environmental Conservation and Chemical Corporation. Mr. J. Thomas Fitch, Division of Land Pollution Control, met with Mr. Bill Weddle, Environmental and Safety Manager, to inspect the barrel storage facility, and to address problems associated with this facility.

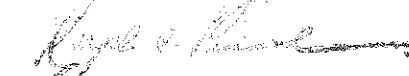
During the inspection of the facility, Mr. Fitch discussed the following:

1. Reduction of barrel inventory.
2. Installation of cooling towers to replace the existant cooling pond.
3. Disposal of contaminated soil located in the "North pit area."
4. Elimination of leaking, openlidded, popped top, bungless, and corroded barrels.
5. Compliance with RCRA Rules and Regulations.

Mr. Fitch noted that all spills found during previous inspections had been eliminated. Also there has been some reduction in the number of bungless and open topped drums. There were trailers storing non-processed wastes stored outside the secure facility. Mr. Fitch was informed that this problem would be eliminated immediately.

Mr. Weddle was instructed to review correspondence between the Environmental Management Board and you so that he could familiarize himself with problems associated with the facility.

Very truly yours,



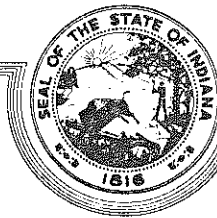
Ralph C. Pickard
Technical Secretary

TFitch/tal

cc: Phil Rarick
Richard Shandross ✓
Boone County Health Department
Roy Strong
Jim Wessel

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P.O. Box 1964

Mr. Gary Watson
Attorney at Law
Box 110
Lebanon, IN 46052

DEC 23 1981

Dear Mr. Watson:

Re: December 8, 1981, Inspection at the
Environmental Conservation and Chemical
Corporation

On December 8, 1981, Mr. J. Thomas Fitch, Division of Land Pollution Control, conducted an inspection of the Environmental Conservation and Chemical Corporation. After the inspection, Mr. Fitch met with Mr. Jim Wessel, General Manager, to discuss the following items noted during the inspection:

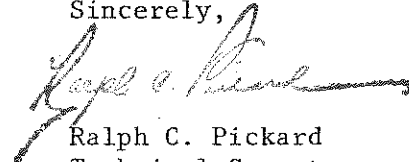
1. Semi-trailers are storing non-processed wastes off-site in the parking lot adjacent to the secure facility. There were ten trailers noted. Mr. Wessel stated that this problem would be abated by December 22, 1981.
2. Damaged and deteriorated barrels noted during previous inspections have not yet been processed. Mr. Wessel stated that these barrels would be processed by December 22, 1981.
3. Standing water contaminated by spilled or leaking wastes were found north of the cooling pond on the eastern boundary to the facility, on the north boundary of the facility, and on the east side of the concrete storage pad. Mr. Wessel agreed to have the material cleaned up immediately.
4. Barrels which are used in the bulk storage program were not lidded. All barrels storing hazardous waste shall be sealed unless the barrel is being used for processing. Mr. Wessel agreed to have these barrels sealed immediately.

Other items discussed include the following:

1. The identification of wastes generated by ECC and sent to the Four-County Landfill for disposal.

2. Submittal of a drum inventory reduction plan by the Receiver to the Environmental Management Board and the Attorney General's Office.
3. Submittal of plans detailing progress being made in the disposal of the contaminated soil in the "north pit" and securing of the cooling pond and erection of cooling towers. These plans should be submitted by the Receiver to the Environmental Management Board and the Attorney General's Office.
4. Compliance with RCRA rules and regulations within 30 days after receipt of letter detailing the deficiencies noted. Also, a letter will be sent to the Environmental Management Board detailing actions initiated to achieve compliance.

Sincerely,

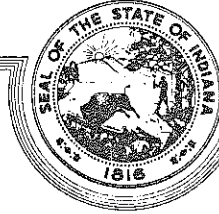


Ralph C. Pickard
Technical Secretary

cc: Mr. Richard Shandross, U.S. EPA ✓
Mr. Phil Rarick, Deputy Attorney General
Boone County Health Department
Mr. Roy Strong
Mr. Jim Wessel

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P.O. Box 1964

RECEIVED

DEC 14 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

DEC 10 1981

Mr. Gary Watson
Attorney at Law
Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: November 30, 1981, Meeting With
Messrs. Strong, Wessel, and Watson

This letter will confirm the November 30, 1981, meeting Messrs. J. Thomas Fitch and Lee Langlotz conducted with Messrs. Roy Strong, Jim Wessel, and you. The purposes of the meeting were: to discuss the results of an EPA Interim Status Inspection of the Environmental Conservation and Chemical Corporation (ECC) facility; compliance with the Consent Decree signed between ECC and the Environmental Management Board; and reduction of barrel inventory at the facility.

During the month of November Mr. Fitch conducted a RCRA Interim Status Inspection of the Environmental Conservation and Chemical Corporation facility. The results are as follows:

- | | |
|---------------------|--|
| 40 CFR 265.15(b) | Owner or operator inspections do not include the inspection of safety and emergency equipment. |
| 40 CFR 265.15(b) | Owner or operator inspections do not include security devices. |
| 40 CFR 265.15(b) | Owner or operator inspections do not include the inspection of operating and structural devices. |
| 40 CFR 265.15(d) | Owner or operator does not record inspections in an inspection log. |
| 40 CFR 265.16(d)(3) | Personnel training records do not include a description of personnel training. |
| 40 CFR 265.16(d)(4) | Personnel training records do not include records of personnel training. |

40 CFR 265.17(a)	"No Smoking" signs are not on premises where required.
40 CFR 265.31	There is evidence of fire, explosion, or release of hazardous waste or hazardous waste constituents on premises which could threaten human health or the environment.
40 CFR 265.33	Owner or operator has not established testing and maintenance procedures for emergency equipment.
40 CFR 265.35	There is not adequate aisle space for the unobstructed movement of personnel and emergency equipment.
40 CFR 265.73(a)	A written operating record is not maintained as required.
40 CFR 265.73(b)(3)	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections not in operating record.
40 CFR 265.73(b)(5)	The operating record does not include facility inspections.
40 CFR 265.171	Containers are not in good condition.
40 CFR 265.172	Containers are not compatible with waste in them.
40 CFR 265.173(a)	Containers are not stored closed.
40 CFR 265.173(b)	Containers are not properly managed to prevent leaks.
40 CFR 265.174	Containers are not inspected weekly for leaks and deterioration.
40 CFR 265.194	Required daily and weekly inspections are not complied with.

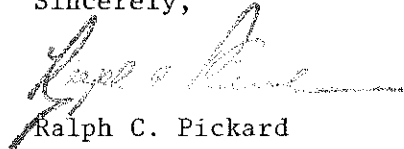
In review of Consent Decree deadlines, it was determined that all deadlines have been met with the following exceptions:

1. Cooling pond secured by September 1, 1981.
2. Removal of sludge and contaminated soil by November 1, 1981.

Information concerning the status of these two projects shall be submitted to the Attorney General's Office and the Environmental Management Board.

Concerning the reduction of barrels on-site, Mr. Strong was informed that a Barrel Reduction Plan including a reduction strategy should be submitted to the Attorney General's Office and the Environmental Management Board.

Sincerely,

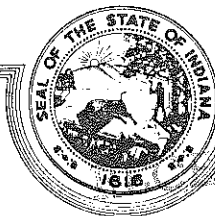

Ralph C. Pickard
Technical Secretary

JTF/ds

cc: Mr. Richard Shandross, U.S. EPA ✓
Mr. Phil Rarick
Mr. Roy Strong
Mr. Jim Wessel
Boone County Health Department

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

DEC 10 1981

WASTE MANAGEMENT BRANCH
EPA REGION V

DEC 07 1981

Mr. Gary Watson
Attorney At Law
Box 110
Lebanon, Indiana 46052

Dear Mr. Watson:

Re: Inventory of Barrel Storage Areas
November 24 and December 1, 1981 at
the Environmental Conservation and
Chemical Corporation (ECC)

On November 24, 1981, Mr. J. Thomas Fitch, Division of Land Pollution Control, conducted an inventory of the non-processed barrels of waste located at the Environment Conservation and Chemical Corporation (ECC). Mr. Fitch was assisted during this inventory by Mr. John Grimm and Mr. Tony Clark of ECC. The breakdown of the inventory is as follows:

I.	Barrels located on the concrete storage pad	9,565
II.	Barrels located between the concrete storage pad and the cooling pond	3,876
III.	Barrels located in trailers off-site	564
IV.	Barrels located north and west of the processing building	2,840
V.	Barrels located east of the processing building	<u>6,326</u>
VI.	Total number of barrels	23,171

On December 1, 1981, Mr. Thomas Fitch and Mr. Lee Langlotz, Division of Land Pollution Control, conducted an inventory of the number of leaking, former leaking, popped top, corroded/damaged, and open top/bungless barrels on-site and on trailers off-site. The inventory was divided between those barrels located on the concrete storage pad, and those in all other storage areas. The inventory was as follows:

Mr. Gary Watson

-2-

I. Barrels located on the concrete storage pad:

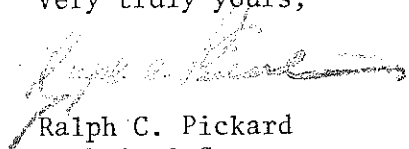
1. Leaking barrels of waste	14
2. Former leaking barrels of waste	29
3. Popped top barrels of waste	9
4. Corroded/damaged barrels of waste	22
5. Bungless/open topped barrels of waste	<u>5</u>
6. Total	79

II. Barrels located in other storage areas:

1. Leaking barrels of waste	20
2. Former leaking barrels of waste	10
3. Popped top barrels of waste	31
4. Corroded/damaged barrels of waste	48
5. Bungless/open top barrels of waste	<u>35</u>
6. Total	144

Mr. Roy Strong was informed that a barrel reduction strategy with reduction schedule should be submitted to the Indiana Attorney's Office and the Environmental Management Board. This should be submitted by you, as Receiver for the Environmental Conservation and Chemical Corporation.

Very truly yours,

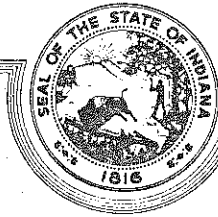

Ralph C. Pickard
Technical Secretary

TFitch/tal

cc: Roy Strong
Jim Wessel
Richard Shandross ✓
Arnold Leder
Boone County Health Department
Phil Rarick

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

Mr. Gary Watson
Attorney-at-Law
P.O. Box 110
Lebanon, IN 46052

DEC 01 1981

1330 West Michigan Street
P.O. Box 1964

RECEIVED
DEC 1 1981
WASTE MANAGEMENT BRANCH
EPA REGION V

Dear Mr. Watson:

Re: Enviro-Chem Corporation
Inspection November 17, 1981

This letter confirms the November 17, 1981 inspection of the Enviro-Chem Corporation by Mr. J. Thomas Fitch, Division of Land Pollution Control. Mr. Fitch inspected the barrel storage facility and discussed RCRA requirements with Mr. Jim Wessel, General Manager.

Mr. Fitch noted the following:

1. The barrel inventory on-site is still in excess of 15,000 drums. The inventory planned for the week of November 16, 1981, shall be completed by November 25, 1981.
2. The contaminated surface drainage water is being pumped into the cooling pond for storage after the solvent/oil phase is removed.
3. The contaminated soil in the "north pit" was under water. This makes it extremely difficult to work with this waste.
4. A concrete pad has been completed in the processing area for the staging of incoming wastes.
5. The deteriorated barrels stored on the new concrete storage pad had not been removed. They shall be removed by November 20, 1981.
6. There is no testing or maintenance procedure for emergency equipment as required by 40 CFR Section 265.33. Compliance with this requirement shall be achieved by December 12, 1981.

If there are any questions concerning this matter, please contact Mr. Tom Fitch at AC 317/633-0215.

Very truly yours,

TFitch/tal

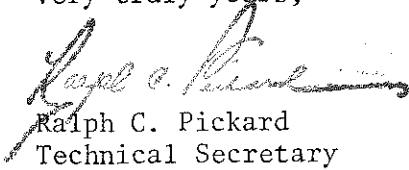
cc: Phil Rarick

Richard Shandross ✓

Roy Strong

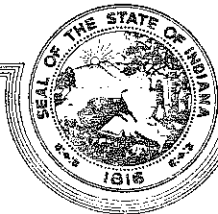
Jim Wessel

Boone County Health Department


Ralph C. Pickard
Technical Secretary

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

November 13, 1981

Mr. Gary Watson
Attorney at Law
Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: November 6, 1981, Inspection
of the Enviro-Chem Corporation

This letter is written to confirm the inspection of the Enviro-Chem Corporation on November 6, 1981, by Mr. J. Thomas Fitch of the Division of Land Pollution Control. Mr. Fitch reviewed sampling and testing procedures of incoming loads with Mr. Art Spinner, Chemist for the Enviro-Chem Corporation. Mr. Spinner was informed that to adequately characterize the waste generated by the Enviro-Chem Corporation, additional tests may be required for incoming wastes. This applies to wastes that are hazardous due to characteristics other than ignitibility (i.e., paints, inks).

Mr. Fitch also reviewed personnel records of those engaged in the handling of hazardous wastes including management personnel. These records were found to be inadequate for the purposes of the Resource Conservation and Recovery Act (RCRA). Personnel records should address all points addressed in Section 265.16 of 40 CFR, May 19, 1980. These personnel records will be upgraded to include all items required by RCRA by November 27, 1981. Operator inspections were also reviewed and were found to not include all items addressed in Section 265.15 of 40 CFR, May 19, 1980. Operator inspections will be upgraded to include all items required by RCRA by November 27, 1981.

An inspection of the storage facilities revealed that damaged and deteriorated barrels noted in the last letter are still in storage. As was noted, the barrels stored on the concrete pad will be removed and processed by November 20, 1981. Barrels located in the northwest corner of the processing yard will be removed and processed by November 27, 1981.

An inventory of barrels of waste will be made by Mr. Fitch during the week of November 16, 1981. This will be conducted to gain an accurate count of the number of barrels in storage.

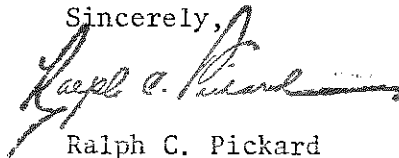
RECEIVED

NOV 17 1981

WASTE MANAGEMENT BRANCH
EPA, REGION 7

It was found that non-processed barrels of waste were again being stored in trailers outside the secure facility. The earthen dike has been constructed as required. These barrels will be removed from those trailers and placed in the secure facility for storage. This shall be accomplished by December 4, 1981. After this date, storage of non-processed wastes outside the secure facility shall be prohibited.

Sincerely,



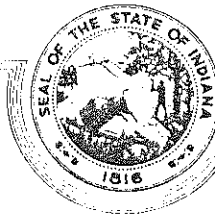
Ralph C. Pickard
Technical Secretary

JTFitch/mjh

✓cc: Mr. Richard Shandross, U.S. EPA
Mr. Phil Rarick, Deputy Attorney General
Mr. Roy Strong, Enviro-Chem Corporation
Mr. Jim Wessel, Enviro-Chem Corporation
Boone County Health Department

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P.O. Box 1964

November 9, 1981

Mr. Gary Watson
Attorney at Law
P. O. Box 110
Lebanon, IN 46052

RECEIVED

OCT 11 1981

WASTE MANAGEMENT DIVISION
EPA REGION 7

Dear Mr. Watson:

Re: October 27 and 30, 1981
Inspection of the
Enviro-Chem Corporation

On October 27 and 30, 1981, the Enviro-Chem Corporation facilities were inspected. On October 27, 1981, Mr. J. Thomas Fitch, Division of Land Pollution Control, randomly inspected the Work Product Records of Enviro-Chem Corporation clients. This was to confirm that waste analyses had been received from the generators or adequate testing has been performed by the Enviro-Chem Corporation laboratory prior to acceptance at the facility.

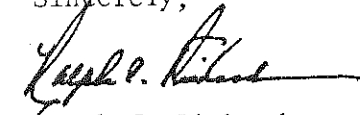
On October 30 Mr. Lee Langlotz and Mr. Fitch, Division of Land Pollution Control, inspected the Enviro-Chem Corporation facilities with Mr. John Grimm. They also held a meeting with Mr. Roy Strong and Mr. Jim Wessel. The following items were noted during the inspection:

1. The contaminated soil located near the cooling pond will not be disposed of by November 1, 1981. The reason is that the soil has been found to be contaminated with hazardous wastes which cause it to have the characteristic of ignitability. Because the waste has been contaminated with listed hazardous wastes stored at the site or from spills of these wastes the soil is hazardous by definition. If the soil is to be treated, it must be in accordance with treatment indicated on the RCRA Form 3. This soil might possibly be processed to reclaim the wastes, with the soil being disposed of in an approved landfill.
2. The cooling tower to be erected to provide cooling water for processing will be erected by December 1, 1981. The tower is to be erected on the east side of the processing building.
3. During the inspection of the facility barrels were found to be stored in semi trailers outside the secure facility. An earthen dike one foot in height was to be erected before the end of the day.

Mr. Gary Watson

4. Damaged and deteriorated barrels found at the northwest corner of the processing area will be disposed of by November 20, 1981.

Sincerely,



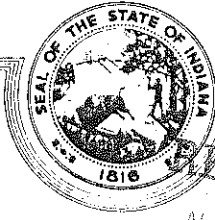
Ralph C. Pickard
Technical Secretary

JTF/mjh

cc: Mr. Phil Rarick
Mr. Richard Shandross, US EPA
Mr. Roy Strong
Mr. Jim Wessel

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1300 West Michigan Street
P. O. Box 1964

NOV 02 1981

Mr. Gary Watson
Attorney at Law
P. O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: October 21 and 23, 1981, Inspections
of Enviro-Chem Corporation

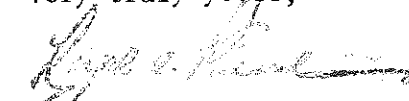
On October 21 and 23, 1981, Mr. J. Thomas Fitch, Land Pollution Control Division, inspected the Enviro-Chem Corporation's barrel storage facilities and production areas. The following items were noted:

1. There are trailers stored outside of the barrel storage facility which hold drums of non-processed wastes. The trailers are stored near the unnamed drainage ditch west of the Enviro-Chem Corporation property. These trailers will be emptied of drums by October 30, 1981, or a earthen dike will be built between the trailers and the ditch.
2. Many of the barrels which have been placed on the new concrete storage pad are in poor condition. These drums are corroded, leaking, unlidded or without bungs. These drums have been placed on a single level so that they will be processed first. These drums shall be processed by November 14, 1981.
3. The storage facility which is located outside the secure facility has been changed. During the Enviro-Chem Corporation open house many of the barrels were removed. When the barrels were again placed in this facility, the absorbent pillows were improperly placed and the earthen dike lowered. The pillows shall be placed on the interior of the dike at its base. The dike will be again built to a height of one foot.
4. The contaminated soil located in the north pit was tested by the Indiana State Board of Health laboratories. It was found that when the soil is heated it exhibited the hazardous waste characteristic of ignitibility. There are no results available for the Extraction Procedure for Heavy Metals. Because the soil is a solid waste and has been contaminated by hazardous wastes from spills and leaking barrels, it is considered a hazardous waste as defined in 40 CFR 261.3. Therefore, it must be disposed of at an approved hazardous waste site.

5. It was noted that there were two spills in the northwest processing area. These spills were not being cleaned up. Workers shall be instructed that all spills shall be cleaned up immediately. Compliance with this recommendation shall be reviewed during future inspections of the Enviro-Chem Corporation facilities.

Mr. Wessel was also informed that the EPA designations used for the wastes generated by Enviro-Chem Corporation are incorrect. Drum bottoms, not still bottoms, are generated as wastes at Enviro-Chem Corporation. Therefore, it shall be determined what appropriate designation(s) will be used to define the waste generated at Enviro-Chem Corporation, so that Enviro-Chem Corporation will no longer be in violation of Section 262.11 of RCRA.

Very truly yours,

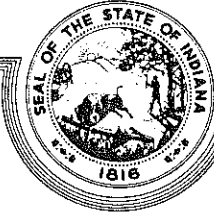

Ralph C. Pickard
Technical Secretary

JTFitch/mjh

cc: Mr. Phil Rarick
Mr. Richard Shandross, U.S. EPA ✓
Mr. Roy Strong
Mr. Jim Wessel

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS 46206

1330 West Michigan Street
(317) 633-4420

OCT 27 1981

Mr. Gary Watson
Attorney at Law
P.O. Box 110
Lebanon, IN 46052

RECEIVED
OCT 28 1981
WASTE MANAGEMENT BRANCH
EPA, REGION 7

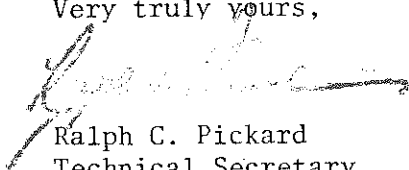
Dear Mr. Watson:

Re: Inspections of Enviro-Chem Corporation
October 14 and 16, 1981

This letter will confirm the October 14th and 16th inspections of the Enviro-Chem Corporation. On October 14th, Mr. J. T. Fitch of the Land Pollution Control Division inspected the barrel storage facility. At that time, an additional concrete slab had been poured. Barrels were being redistributed to the north processing area to help facilitate an additional concrete pour anticipated the next day. The barrels were being loaded onto flat bed trailers for transportation. Barrels that were found to be leaking, corroded, without bungs or lids are to be processed first, with other barrels being placed upon the concrete pads for storage. At the time of the inspection, the "defective" containers were stored on the concrete pad. They are stored on a single level to differentiate those in good or poor condition. These barrels should be processed immediately to reduce the numbers of defective barrels on-site.

On October 16th, Mr. Fitch and Mr. Lee Langlotz inspected the barrel storage area. It was found that the additional concrete pour had taken place as scheduled. There is now only one additional pour to be made to complete this project. The dried barrel storage area outside the secure facility was being removed. The barrels in this area were being readied for processing. Any contaminated soil in this storage area must be removed and disposed of in a proper manner.

Very truly yours,

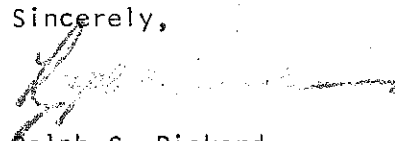

Ralph C. Pickard
Technical Secretary

TFitch/tal

cc: Steve Zlatos
Richard Shandross ✓
Roy Strong
Jim Wessel

Production Report that will be completed on a weekly basis. This report will include the number of barrels on-site, as well as other pertinent information. It was recommended that copies of these reports be sent to the Environmental Management Board. Mr. Wessel has agreed to have this done.

Sincerely,



Ralph C. Pickard
Technical Secretary

TF/cm

cc: Mr. Roy Strong
Mr. Jim Wessel
Mr. Phil Rarick
Mr. Richard Shandross ✓
Boone County Health Department

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD

OCT 19 1981

Mr. Gary Watson
Attorney at Law
P. O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: September 29 and October
inspections of the Enviro-Chem
Corporation

This letter confirms the September 29 and October 2, 1981 inspections of the Enviro-Chem Corporation by Mr. J. Thomas Fitch, Division of Land Pollution Control. On September 29, 1981, an inspection of the barrel storage areas resulted in the following observations:

1. Barrels of waste which had been stored outside the secure facility had not been diked as required.
-This item was completed October 1, 1981.
2. Mr. Fitch was not able to inspect all inlet valves leading to the underground storage tank referenced in the Consent Decree.
-This item was completed October 2, 1981.
3. Mr. Fitch was not able to sample the contaminated soil located at the old barrel storage area.
-This has not been resolved.
This soil cannot be approved for disposal until it has been tested.
4. Mr. Fitch requested that a timetable for the reduction of the barrel inventory be completed.
-This has been completed.
5. Mr. Fitch requested that a count of barrels on-site be completed.
-This has been completed.

On October 2, 1981, Mr. Fitch conducted an inventory of barrels on-site. At that time, it was estimated that there were in excess of 20,000 barrels. The Enviro-Chem Corporation feels that there were approximately 16,300 barrels on-site.

Mr. Jim Wessel, General Manager, presented to Mr. Fitch a



INDIANAPOLIS, 46206

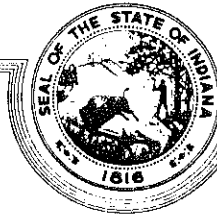
1330 West Michigan Street
P. O. Box 1964

RECEIVED
OCT 20 1981

WASTE MANAGEMENT BRANCH
EPA REGION 7

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

Mr. Gary Watson
Attorney at Law
P. O. Box 110
Lebanon, IN 46052

OCT 20 1981

RECEIVED
OCT 21 1981
WASTE MANAGEMENT BRANCH
EPA REGION 7

Dear Mr. Watson:

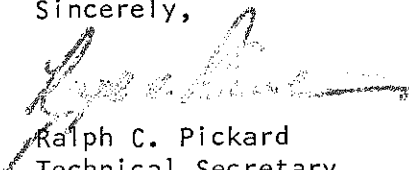
Re: October 6, 1981 inspection
of Enviro-Chem Corporation

This letter is written to confirm the October 6, 1981 inspection of the Enviro-Chem Corporation. This inspection was conducted by Mr. J Thomas Fitch, Division of Land Pollution Control. Mr. Fitch discussed with Mr. Finton the progress in complying with requests made the week before.

Mr. Fitch sampled the contaminated soil located in the old North barrel storage area. Eight soil samples were taken from three different locations. The samples were extracted from various depths to 30 inches below the surface. These samples will be analyzed for Volatile Organics and Extractable metals including: Arsenic, Barium, Chromium, Cadmium, Lead, and Mercury. The analysis of the samples will aid in the determination of a suitable disposal site for this soil.

Mr. John Grimm and Mr. Fitch inspected barrels stored outside the secure facility, on the concrete pad, and barrels located 170 feet North of the concrete pad. They inspected these areas to determine the number of leaking, popped top, corroded, and unlidded barrels in these areas. Those barrels listed in the above categories shall be removed from storage and pumped of waste material. Mr. John Grimm hopes to have the second concrete pour completed by October 9, 1981, and the last pour being completed some time during the week of October 12, 1981.

Sincerely,

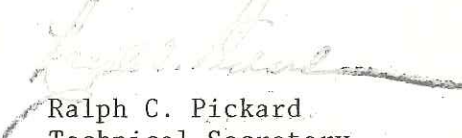

Ralph C. Pickard
Technical Secretary

TF/cm

cc: Mr. Roy Strong
Mr. Jim Wessel
Mr. Phil Rarick
Mr. Richard Shandross ✓
Boone County Health Department

with timetables set. Concerning this matter, it was learned that shipments of waste were received from Egyptian Lacquer and Roll Coater after the inventory freeze was initiated. Please contact me immediately concerning this matter.

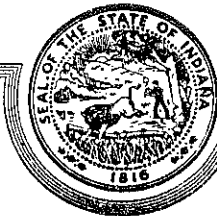
Very truly yours,


Ralph C. Pickard
Technical Secretary

JTF/tr

cc: Hon. Linley Pearson, Attorney General
Mr. Phil Rarick, Deputy Attorney General
Mr. Roy Strong, Environmental Conservation and
Chemical Corporation
Egyptian Lacquer
Roll Coater
Attn.: Mr. Tim Kelley
Mr. Richard Shandross, U.S. EPA ✓
Boone County Health Department
Boone County Circuit Court

STATE OF INDIANA



INDIANAPOLIS 46206

ENVIRONMENTAL MANAGEMENT BOARD

1330 West Michigan Street
(317) 633-4420

VIA CERTIFIED MAIL

Mr. Gary Watson
Attorney at Law
P. O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: September 25, 1981, Inspection
Enviro-Chem Corporation

This letter confirms the September 25, 1981, inspection of the Enviro-Chem Corporation Barrel Storage Facility by Mr. J. Thomas Fitch of the Solid Waste Management Section, Indiana State Board of Health. At the time of the inspection the south end of the central barrel storage facility was being prepared so that a concrete pad and curb could be poured. Again, there was an excessive number of barrels on-site. Leaking, popped top, corroded, and barrels without bungs were found in the storage facilities. There were no defined aiseways in the storage areas.

To help facilitate the pouring of the concrete, barrels were stored outside the secured facility. Mr. Fitch was asked if additional barrels could be stored outside the secured facility. Mr. John Brimm and Mr. Jim Wessel were informed that the barrels could be stored in the drive outside the secured facility if:

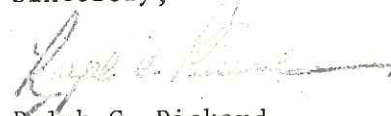
1. An earthen dike were formed around the storage area.
2. Absorbent pillows are placed within the earthen dike.
3. The barrels will be inspected daily for defects and leaks.
4. If barrels are found to be leaking, they will be removed immediately and the waste cleaned up.
5. If spills or leaks do occur, the gravel and 2 inches of the earth beneath shall be removed and disposed of at a hazardous waste landfill.
6. Storage in this area will be temporary, not lasting more than three (3) weeks.

If there conditions are met, their storage will be allowed outside the secured facility.

RECEIVED
OCT - 9 1981
WASTE MANAGEMENT BRANCH
EPA REGION V

Samples were not taken of the contaminated soil located north of the cooling pond. This was due to the liquid consistency of the soil. Mr. Tony Clark was asked to have some of the soil dug out and placed on the bank so that it can dry out and samples can be taken. Hopefully, this will be completed during the week of September 28, 1981. The soil will be tested for metal and organic contamination.

Sincerely,

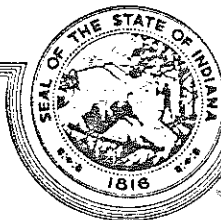

Ralph C. Pickard
Technical Secretary

JTFitch/mjh

cc: Mr. Roy Strong
Mr. Richard Shandross ✓
Mr. Phil Rarick
Boone County Health Department

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS 46206

1330 West Michigan Street
(317) 633-4420

SEP 23 1981

VIA CERTIFIED MAIL

Mr. Gary Watson
Attorney at Law
P. O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: September 15, 1981, Inspection
Enviro-Chem Corporation
Barrel Storage Facility

This letter will confirm the September 15, 1981, inspection of the Enviro-Chem Corporation Barrel Storage Facility conducted by Mr. John Thomas Fitch of the Solid Waste Management Section.

Mr. Fitch noted that the central barrel storage facility had been drained of ponded surface water thus allowing the workers to enter the area and work. The men were clearing the southern section of this facility so that an initial concrete pad may be poured on September 23. Mr. Wessel was informed that a letter should be drafted to the Environmental Management Board outlining the methods used to drain the barrel storage facility of ponded surface water. He stated that this would be completed. It was noted that there had been a slight reduction in the number of barrels on-site. It is anticipated that the barrel inventory can be reduced to 8,000 barrels by January of 1982.

The request for approval to dispose of contaminated soils from Enviro-Chem Corporation at the Northside Landfill must be denied. This is due to Part II, Item 16 of the Consent Decree signed by Enviro-Chem Corporation. This soil is located at the northeast corner of the cooling pond. The soil is contaminated due to leaks from barrels and spills during the pumping of tanks and barrels. Ponded surface water in this area is contaminated initially by these agents. Later, due to the evaporating of the water and lowering of its level, the soil is contaminated. The underlying soil has been dredged and stockpiled as noted. It is the opinion of the geology staff that since contaminated water is still standing in this area, the newly exposed soil may become contaminated.

It is recommended that Enviro-Chem Corporation work more closely with the Environmental Management Board and its agents when complying with items of the Consent Decree. This is to insure that actions initiated are acceptable with the Environmental Management Board.

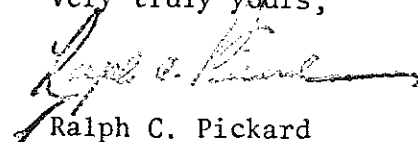
RECEIVED
SEP 28 1981
WASTE MANAGEMENT BRANCH
EPA, REGION 7

Mr. Gary Watson

During the inspection of the barrel storage facility the following was noted:

1. Leaking barrels of waste.
2. Popped top barrels of waste.
3. Corroded barrels of waste.
4. Lack of defined aisleways.
5. Excess number of barrels on-site.
6. Trailers with non-processed wastes stored off-site.

Very truly yours,

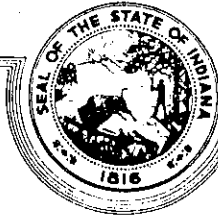

Ralph C. Pickard
Technical Secretary

JTF/mjh

cc: Mr. Roy Strong
Enviro-Chem Corporation
Boone County Health Department

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

RECEIVED
SEP 20 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

SEP 21 1981

Mr. Gary Watson
Attorney at Law
124 East Washington Street
P.O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: September 4, 1981, Inspection
Enviro-Chem Barrel Storage Facility

This letter is written to confirm the September 4, 1981, inspection of the Enviro-Chem Barrel Storage Facility. This inspection was conducted by Mr. John Thomas Fitch of the Solid Waste Management Section, Indiana State Board of Health. He was accompanied by Mr. John Grimm.

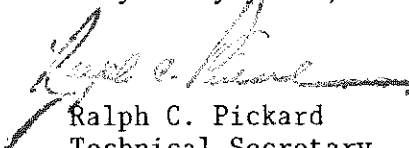
Once again, Mr. Fitch found the facility to be extremely crowded with barrels. So much so that four trailers loaded with non-processed wastes are sitting outside the secured facility. This is a violation of 40 CFR Section 265.14 2(i). The entrance to the facility has barrels stacked on each side of the roadway. The A-frame building is completely surrounded with barrels. The processing yard is still crowded with non-processed wastes, especially the area to the north of the facility. Total barrel inventory including the central storage facility is estimated at 12,000 barrels. This must be reduced before the operation will be able to run efficiently, and in a controlled manner.

In the central barrel storage facility, the barrels are stored haphazardly. There are very few distinct rows of barrels. This makes it very difficult to inspect this area. Also, access to leaking, popped topped and corroded barrels is very difficult, if existent. This allows many spills in this area to go without clean-up. Also, these damaged drums cannot be extracted from the total due to lack of access. This is a violation of 40 CFR 265.35. There were leakers, popped top, and corroded barrels on-site. When these are found, it should be documented by location and corrective actions noted. If not, then these barrels will remain in storage, which is a violation of 40 CFR 265.171.(2) and (3). Many barrels are stored in ponded surface drainage water. When the water comes into contact with the drums, it becomes contaminated. This is due to the leaking barrels of wastes and the spills in the storage area.

On this Friday, it was noted that the surface water was going off-site in the area near the back entrance. This is at the southwest corner of the storage facility. This water appeared to be contaminated due to the colored sheen on top of the liquid. The liquid drained into the drainage ditch located on the west and southwest sides of the storage facility. This drains into the unnamed ditch which drains into Finely Creek. Water samples were taken upstream, at the site of possible pollution, at the unnamed ditch, and at Finely Creek. The samples will be tested for contamination. It is recommended that this area be monitored so that further drainage off-site can be prevented.

In the afternoon Mr. Fitch met with Mr. Grimm and Mr. Jim Wessel to discuss rules and regulations applicable to the Enviro-Chem Corporation operations. They also discussed the findings of the day's inspection.

Very truly yours,


Ralph C. Pickard
Technical Secretary

TFitch/lmm

cc: Richard Shandross ✓
Phil Rarick
Roy Strong
Jim Wessel

STATE OF INDIANA

INDIANAPOLIS

STATE BOARD OF HEALTH

AN EQUAL OPPORTUNITY EMPLOYER

September 16, 1981

Mr. Gary L. Watson
Attorney at Law
124 East Washington Street
P.O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

This letter confirms the August 28, 1981, inspection of the Enviro Chem Corporation. Mr. John T. Fitch inspected the barrel storage facility with John Grimm, Environmental and Safety Manager, and Ms. Pat Allen reviewed manifests on file for the months of July and August of 1981.

Ms. Allen has a few questions concerning the manifest review, and would like to discuss them with you.

During the inspection, and afterwards in a meeting with Mr. Jim Wessel, General Manager, Mr. Fitch voiced the following concerns.

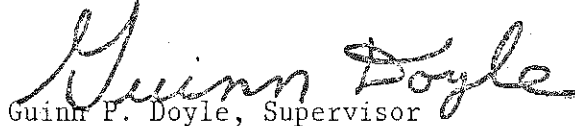
1. leaking barrels of waste on site
2. pop top barrels on site
3. corroded barrels of waste
4. barrels on-site without secured tops
5. barrels on-site without bungs
6. access through aiseways poor, if existant
7. no access through the storage area on the north side of the facility
8. surface drainage water ponding on the south side of the central storage facility causing barrels to be stored in water
9. there are approximately 12,000 barrels on site

10. flat bed trailers and enclosed trailers are storing nonprocessed waste outside the secured facility

Mr. Fitch found that weekly inspections of the facility are again being documented. It was recommended that detailed explanations be given for all work performed in the barrel storage facility. A locational chart is being used to log in new shipments of waste. Waste are to be stored according to flammability class and similar waste streams are to be stored together.

Mr. Fitch was informed that there has been a net reduction of approximately 600 drums of waste in the past two weeks. The proposed concrete pour date is still September 15, 1981. The barrel inventory must be significantly reduced before this activity can be initiated.

Very truly yours,

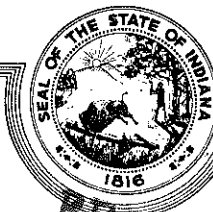


Guinn P. Doyle, Supervisor
Hazardous Waste Program
Solid Waste Management Section
Division of Sanitary Engineering
AC 317/633-0178

JTFitch/tr

cc: Mr. Richard Shandross
Region V, EPA
Mr. Philip Rarick
Attorney General's Office
Mr. Roy Strong
Enviro Chem Corp.
Mr. Jim Wessel
Enviro Chem Corp.

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH
AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206

RECEIVED

SEP 18 1981

WASTE MANAGEMENT BRANCH
EPA REGION 4

SEP 10 1981

Mr. Gary Watson
Attorney at Law
124 East Washington Street
P.O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: August 21, 1981, Inspection
Enviro-Chem Barrel Storage Facility
Boone County

This will confirm the August 21, 1981, inspection of the Enviro-Chem Barrel Storage Facility by Mr. John Thomas Fitch of the Solid Waste Management Section, Indiana State Board of Health. Mr. Fitch met with Mr. Jim Wessel, the new General Manager of the Enviro-Chem Corporation. They inspected the facility along with members of the Enviro-Chem Corporation facility management.

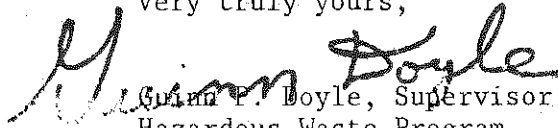
Mr. John Grimm, Environmental and Safety Manager, showed Mr. Fitch that the underground storage tank which was to be shut-off by August 1, 1981, has been sealed. This was completed by concreting the inlet valves to the tank.

Again, it was found that the barrel storage facility is extremely crowded. There are barrels stored off the facility in a flatbed trailer, near the front entrance, near the A-frame building, and at the north side of the facility, as well as the centralized barrel storage facility. It was noted that the barrel inventory has been reduced, but access is still extremely poor. This makes it very difficult to work in these areas to reduce the inventory. This condition should be improved as soon as possible.

The standing water at the southeast corner of the central barrel storage facility has evaporated. The water level in the cooling pond is still elevated and should be reduced, the freeboard level should never be less than two feet. Again, this should be checked on a daily basis.

13. Enviro-Chem Corporation paperwork should be reviewed by Mr. Wessel to determine its adequacy and it shall be revised if he finds it to be inadequate for his operations.

Very truly yours,

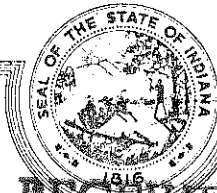


Quinn P. Doyle, Supervisor
Hazardous Waste Program
Solid Waste Management Section
Division of Sanitary Engineering

JTFitch/tr

✓cc: Mr. Richard Shandross
U.S. EPA, Region V
Mr. Philip Rarick
Attorney General's Office
Mr. Roy Strong
Enviro-Chem Corp.
Mr. Jim Wessel
Enviro-Chem Corp.

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH

AN EQUAL OPPORTUNITY EMPLOYER

Mr. Gary Watson
Attorney at Law
124 East Washington Street
P.O. Box 110
Lebanon, IN 46052

RECEIVED

SEP - 8 1981

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206

WASTE MANAGEMENT BRANCH
EPA, REGION V
SEP 8 1981

Dear Mr. Watson:

Re: August 7, 1981, Inspection
Enviro-Chem Barrel Storage Facility
Boone County

This letter confirms the August 7, 1981, inspection of the Enviro-Chem Barrel Storage Facility by Mr. John Thomas Fitch of the Solid Waste Management Section, Indiana State Board of Health. Mr. Fitch found that the facility was extremely crowded with barrels of waste. The front entrance to the facility, the area near the A-frame building, the northeast storage area, and the central barrel storage areas are near capacity. This condition makes it extremely difficult to work in the facility. Access through these areas is poor if existent at all. The inventory of barrels must be reduced to alleviate this condition. It was also noted that a flatbed trailer containing nonprocessed waste was stored outside the facility. This is a violation of RCRA regulations.

There was water ponded on the northeast and southeast corners of the facility. This water should be eliminated as soon as possible. The cooling pond water level was found to be extremely high. The freeboard should never be less than two feet. This should be checked on a daily basis.

You indicated to Mr. Fitch in a meeting that these conditions would not persist. They cannot if the facility is to operate efficiently.

Very truly yours,

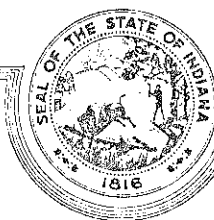
A handwritten signature in cursive script that reads "Guinn P. Doyle".

Guinn P. Doyle, Supervisor
Hazardous Waste Program
Solid Waste Management Section
Division of Sanitary Engineering

JTFitch/tr

cc: Mr. Phil Rarick
✓ Mr. Richard Shandross
U.S. EPA, Region V
Mr. Roy Strong
Mr. Jim Wessel
Enviro-Chem Corp.

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH
AN EQUAL OPPORTUNITY EMPLOYER

Address/Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206

AUG 31 1981

Mr. Gary Watson, Attorney
124 East Washington Street
P.O. Box 110
Lebanon, IN 46052

RECEIVED

SEP - 3 1981

WASTE MANAGEMENT BRANCH
EPA REGION V

Dear Mr. Watson:

On August 4, 1981, Mr. J. Thomas Fitch, Solid Waste Management Section, Indiana State Board of Health, inspected the Four County Landfill near Delong, Indiana. During that inspection, a tractor-trailer from the Enviro-Chem Corporation brought in a load of waste. The manifest stated that the shipment included still and drum bottoms. It was found during an inspection of the load that some of the barrels also included a liquid waste. Due to this fact, part of the shipment was sent back to the Enviro-Chem Corporation. Those barrels containing the solid or semi solid bottoms were disposed of at the landfill.

The Four County Landfill is approved to accept drum and still bottoms from the Enviro-Chem Corporation, not liquid waste. Please insure that only waste that are approved for disposal at this site are sent to the Four County Landfill.

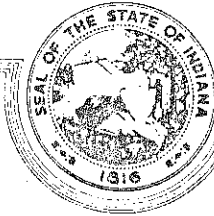
Very truly yours,

Guinn P. Doyle, Supervisor
Hazardous Waste Program
Solid Waste Management Section
Division of Sanitary Engineering

cc: Roy Strong
Enviro-Chem Corporation
Phil Rarick
Attorney General's Office
Richard Shandross—
EPA, Region V
Fulton County Health Department

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

AUG 20 1981

Mr. Gary Watson
Attorney at Law
124 East Washington Street
P.O. Box 110
Lebanon, IN 46052

1330 West Michigan Street
P. O. Box 1966

RECEIVED
AUG 24 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

Dear Mr. Watson:

Re: July 30, 1981, Inspection
Enviro-Chem Corporation
Barrel Storage Facility

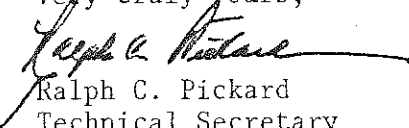
This letter confirms the July 30, 1981, inspection of the Enviro-Chem Corporation Barrel Storage Facility. This inspection was conducted by Mr. Tom Fitch of the Solid Waste Management Section, Indiana State Board of Health. Mr. Fitch first met with Mr. Roy Strong, President, to review the progress made in complying with specific sections of the Consent Decree signed by the Enviro-Chem Corporation. The initial compliance dates for the items reviewed is August 1, 1981.

Mr. Fitch will again review this information, once it is completed and delivered to the Indiana State Board of Health.

Mr. Fitch inspected the barrel storage facility with Mr. Tony Clark. It was noted that there was no improvement since the previous week's inspection. There is still an excessive number of barrels on site, therefore, making it very difficult to work in this facility. There are many barrels with popped tops. There are corroded barrels which at one time leaked hazardous waste. There is little if any access between barrels of waste. Also, the water problem still exists in the south end of the barrel storage facility. Many of the barrels of waste are stored in this area causing them to deteriorate much quicker than normal.

It is suggested that you work with Mr. Clark to improve the conditions within the barrel storage facility.

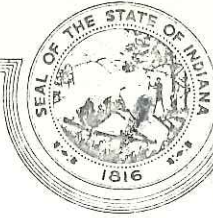
Very truly yours,


Ralph C. Pickard
Technical Secretary

TFitch/jb
Enclosure

cc: Mr. Richard Shandross, Region V, EPA
Mr. Philip Rarick, Attorney General's Office
Mr. Roy Strong, Enviro-Chem Corporation
Boone County Health Department

STATE OF INDIANA



INDIANAPOLIS

STATE BOARD OF HEALTH

AN EQUAL OPPORTUNITY EMPLOYER

VIA CERTIFIED MAIL

AUG 13 1981

Mr. Roy Strong, President
Enviro-Chem Corporation
865 South U.S. 421
Zionsville, IN 46077

Dear Mr. Strong:

On July 16, 1981, Mr. Tom Fitch and Ms. Pat Allen conducted an inspection of the Four County Landfill near Delong, Indiana. An Enviro-Chem Corporation tractor trailer arrived at the site during the scheduled inspection. The manifest stated that the shipment included "hazardous waste NOS (still and drum bottoms)."

Mr. Jim Wilkins, Operator, and Mr. Fitch inspected the contents of selected drums using a metal rod. It was found that two of the drums checked were filled with liquid only. As you are aware, drum and still bottoms should be in a solid or semi-solid state, not liquid. A sample which was extracted from one of the drums for the testing showed that this liquid had a concentrated solvent vapor. The shipment was not accepted by the landfill and was sent back to the Enviro-Chem Corporation.

The Four County Landfill is only approved to accept drum bottoms and still bottoms from your company, not liquid solvents. It is recommended that you ensure that only approved wastes are sent from your company to the Four County Landfill for disposal.

Very truly yours,

Guinn P. Doyle, Supervisor
Hazardous Waste Program
Solid Waste Management Section
Division of Sanitary Engineering
AC 317/633-0178

TF/mjh

cc: Mr. Gary Watson
Mr. Richard Shandross ✓
Region V, U.S. EPA
Mr. Douglas Johnson
Environmental Waste Control Corporation
Mr. Steve Zlatos
Attorney General's Office

RECEIVED

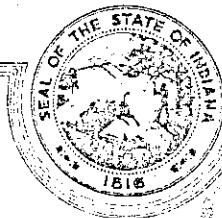
AUG 18 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

1330 West Michigan Street
P. O. Box 1964

July 16, 1981

VIA CERTIFIED MAIL

Mr. Roy Strong, President
Enviro-Chem Corporation
865 South U.S. 421
Zionsville, IN 46077

Dear Mr. Strong:

Re: June 25, 1981, Inspection
Enviro-Chem Corporation
Processing Area

This letter will confirm the June 25, 1981, inspection of the Enviro Chem Corporation Processing Area. The inspection was conducted by Mr. Phil Rarick, Attorney General's Office, and Mr. Tom Fitch, Facility Inspector, Solid Waste Management Section of the Indiana State Board of Health. The Enviro-Chem Corporation was represented by Mr. Mike Finton and you.

The inspection was conducted to determine the progress made in upgrading the Enviro-Chem Corporation Barrel Storage Facility. The concerns mentioned in previous letters include the following:

1. Barrels of hazardous waste stored in water (southside of Barrel Storage Facility).
2. Leaking barrels of hazardous waste.
3. Barrels of hazardous waste with popped tops.
4. Operating record not completed
5. Inadequate access to Barrel Storage Facility.

It was found that the ponded water on the south end of the Barrel Storage Facility had been pumped dry. The water was pumped into the noncontact cooling pond. The contaminated layer on top of the water was recycled through the "Fuels Program." The water in the cooling pond is being spray irrigated on the inside walls of the earthen dike surrounding the facility.

There were no leaking barrels of waste found during the inspection. It was noted, though, that a few barrels had been leaking some time recently as identified by dried drips of waste on the sides of barrels.

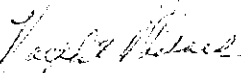
RECEIVED
JUL 17 1981
WASTE MANAGEMENT BRANCH
EPA REGION V

There was an increase seen in the number of "popped top" barrels. This is due in part to the increase in temperature in the last two weeks. When found, these barrels should be pulled from storage and pumped dry. You informed Mr. Fitch that generators of the waste have been asked to increase the freeboard inside the barrel. This will allow more room for vapors to expand without damaging the integrity of the barrel. Also, truck drivers should be cautioned to not accept barrels of waste which are damaged.

The operating record should be completed as in Part 40 CFR 265.73. Also, access to the Barrel Storage Facility should be improved. The barrels should be stored no more than five abreast with adequate aisle space between the rows for operational and emergency equipment.

You informed Mr. Rarick and Mr. Fitch that all the above items could be completely accomplished within the next 60 days.

Very truly yours,

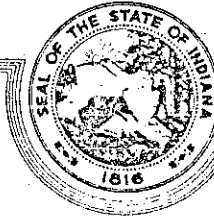


Ralph C. Pickard
Technical Secretary

cc: Mr. Richard Shandross
Region V EPA
Steve Zlatos
Attorney General's Office
Greta Hawermale
Boone County Health Department
Mr. Tom Fitch

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS, 46206

AUG 6 1981

VIA CERTIFIED MAIL

Mr. Gary Watson, Attorney
124 East Washington Street
P. O. Box 110
Lebanon, IN 46052

Dear Mr. Watson:

Re: July 23, 1981, Inspection
Enviro-Chem Corporation
Barrel Storage Facility
Boone County

This letter is written to confirm the July 23, 1981, inspection of the Enviro-Chem Corporation Barrel Storage Facility. The inspection was conducted by Mr. Tom Fitch of the Solid Waste Management Section, Indiana State Board of Health, and Ms. Greta Hawvermale, Chief Sanitarian, Boone County Health Department. They were accompanied by Mr. John Grimm, Facility Engineer for the Enviro-Chem Corporation.

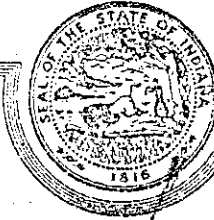
Prior to the inspection, Mr. Fitch and Ms. Hawvermale met with Mr. Roy Strong. Mr. Fitch discussed items addressed in the Consent Decree with the Enviro-Chem Corporation. Compliance schedules were discussed at that time. Mr. Fitch also spoke with Mr. Strong about the returned shipment of waste from the Four County Landfill near Delong, Indiana. The July 16 shipment was returned to Enviro-Chem Corporation because it did not meet specifications noted on the shipping manifest. The manifest stated that the shipment included still and dry bottoms. Liquid wastes were found in two of the barrels. Mr. Strong stated that Mr. Mike Finton was responsible for the disposal of wastes generated by Enviro-Chem Corporation. He assured Mr. Fitch that this would not happen again. Ms. Hawvermale relayed to Mr. Strong that complaints had been received concerning odors emanating from the processing and storage areas. Mr. Strong related that the odor was due to septic conditions of ponded water on-site and could be eliminated when the water is disposed. Until that time, actions have been initiated to minimize this problem.

The inspection of the barrel storage area revealed that conditions are deteriorating in this area. This is due in part to temporary loss of waste fuel customers. The inventory of barrels is now approaching the 13,000 mark and is very difficult to manage. The storage facility is full and barrels are now stored at the front entrance of the processing area. Also, the "broker"

*Perry: make sure to cc ED,
ASAP*

RECEIVED
RAIS 841

STATE OF INDIANA



INDIANAPOLIS 46206

ENVIRONMENTAL MANAGEMENT BOARD

1330 West Michigan Street
(317) 633-4420

JUL 6 1981

VIA CERTIFIED MAIL

Mr. Roy Strong, President
Enviro-Chem Corporation
865 South U.S. 421
Zionsville, IN 46077

Dear Mr. Strong:

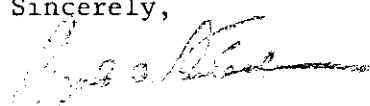
This letter is written to confirm the inspection of the Enviro-Chem Corporation barrel storage facility June 12, 1981. The inspection was conducted by Mr. J. T. Fitch of the Solid Waste Staff. You represented the Enviro-Chem Corporation.

It was noted that there were no leaking barrels and only four "popped top" barrels in the facility. There is still water ponded on the south end of the storage facility. This water should be removed as quickly as possible in an environmentally safe manner.

The access between rows of barrels is still a problem. This is due mainly, because barrels to be pumped are placed in the main aisleway separating the east and west sides of this facility. These barrels should be placed so that there is access between rows of barrels at all times.

The oil spill noted during the June 4, 1981, inspection had not been cleaned up by the June 12, 1981 inspection. This oil should be removed and the water behind the "Broker" storage area removed. The "Broker" storage facility should be organized according to waste streams and aisleways created.

Sincerely,


Ralph C. Pickard
Technical Secretary

TFitch/jb

cc: Richard Shandross, USEPA
Steve Zlatos, Attorney General's Office
Greta Hawvermale,
Boone County Health Department

RECEIVED
JUL 7 1981
WASTE MANAGEMENT BRANCH
EPA. REGION V

STATE OF INDIANA



INDIANAPOLIS 46206

ENVIRONMENTAL MANAGEMENT BOARD

1330 West Michigan Street
(317) 633-4420

June 24, 1981

VIA CERTIFIED MAIL

Mr. Roy Strong, President
Enviro-Chem Corporation
865 South U.S. 421
Zionsville, IN 46077

Dear Mr. Strong:

This letter confirms the inspection of the Enviro-Chem Corporation barrel storage facility conducted May 29, 1981. This inspection was conducted by Mr. Tom Fitch, Facility Inspector, Solid Waste Management Section. He was accompanied by you during this inspection.

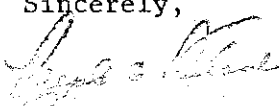
Mr. Fitch noted that improvements have been made in the barrel storage facility. The number of leaking, "popped top" and damaged barrels is decreasing weekly. It was noted that there are still five to ten leaking barrels and approximately twenty "pop topped" barrels on the site. There are also several damaged containers within this facility. As you are aware, there should be no leaking, "popped top," or damaged containers on site as outlined in 40 CFR Section 265.171.

The barrels on the south end of the site are still surrounded by water. Waste has leaked from the barrels and contaminated this water. Also, the integrity of the barrels is questionable if allowed to stand in the water for any length of time.

Access to the barrel storage facility has improved on the eastern and western boundries, but many of the areas are still in need of improvement to comply with 40 CFR 265.35.

It was also noted that there had been an onsite spill of oil in the ponded water area behind the storage facility from barrels of waste brokered by your company. You had stated that the oil was from a vacuum unit. The oil was contained on site and was being cleaned up at the time of the inspection.

Sincerely,


Ralph C. Pickard
Technical Secretary

TF/lm

cc: Mr. Richard Shandross
U.S. EPA, Region V
Mr. Steve Zlatos
Attorney General's Office
Ms. Greta Hawvermale
Boone County Health Department

5. It was noted that there were barrels that were open and others with punctured lids. This is in violation of 40 CFR, Section 265.173(a). "Management of Containers." Containers holding hazardous wastes must be kept closed during storage.

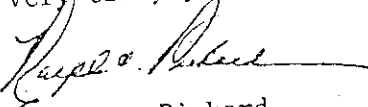
The following is a violation of the Environmental Management Act, IC 13-7-4-1, Section 1(a):

It was noted that the south end of the barrel storage facility was covered with standing water. This water is the result of surface drainage through the barrel storage facility. Some of the barrels of hazardous waste were stored in this flooded area. Due to the fact that many of the containers of hazardous wastes were leaking or had leaked hazardous wastes, this water may be hazardous. This water shall be pumped into empty containers and tested to determine if it is a hazardous waste. If it is, it will need to be handled as such.

Other items noted during this inspection included the following:

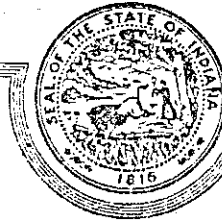
1. The waste streams are at this time stored according to shipment received. If there are multiple waste streams, they are still stored together. This may cause a problem with incompatible waste being stored together.
2. It was noted that some of the waste received were not properly packaged and waste containers were not marked according to 40 CFR, Section 263.30, "Packaging", and 262.32 "Marking."

Very truly yours,


Ralph C. Pickard
Technical Secretary

cc: Steven Elatos, Attorney
General's Office
Richard Shandross, U.S. EPA

STATE OF INDIANA



INDIANAPOLIS 46206

ENVIRONMENTAL MANAGEMENT BOARD

1330 West Michigan Street
(317) 633-4420

VIA CERTIFIED MAIL

JUN 18 1981

Mr. Roy Strong, President
Enviro-Chem Corporation
865 South U.S. 421
Zionsville, IN 46027

RECEIVED

JUN 21 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

Dear Mr. Strong:

This letter is in regard to the inspection conducted May 21, 1981, of the Enviro-Chem barrel storage facility. This inspection was conducted by Mr. Tom Fitch, Facility Inspection for the Solid Waste Management Section. He was accompanied during this inspection by you.

During that inspection, it was noted that the number of leaking containers has been reduced. Five or six leaking containers remain onsite and should be pumped or repackaged. The "popped top" containers are being reduced in number, but many still remain in the facility. These containers should be checked for their integrity and pumped of materials or repackaged.

Due to the recent deluge of rain, approximately 20% of the barrel storage facility is under water. Hazardous waste containers should not be stored in water. The water should be pumped out and the oil, grease, solvent layer skimmed off and processed or containerized. The barrels should be moved to an area where they will no longer be in water.

The operating record appears to be in adequate order. Notations should be made of any leaking, corroded, or "popped top" containers found and what action was initiated to correct the situation. Aisle space between rows of barrels is improving on the east side of the facility. The west side of the facility should be improved. This is to provide access throughout the facility in case of an emergency.

Very truly yours,

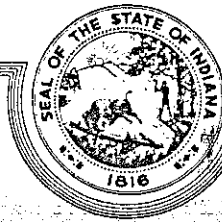
Ralph C. Pickard
Technical Secretary

Tfitch/tal

cc: Mr. Richard Shandross, U.S. EPA, Region V
Mr. Steve Zlatos, Attorney General's Office
Ms. Greta Hawvermale, Boone County Health Department

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS 46206

1330 West Michigan Street
(317) 633-4420

RECEIVED

JUN 14 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

VIA CERTIFIED MAIL

JUN 11 1981

Mr. Roy Strong, President
Enviro-Chem Corporation
865 South US 421
Zionsville, IN 46077

Dear Mr. Strong:

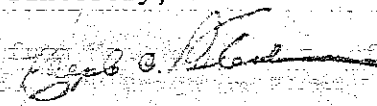
Re: Inspection of
Enviro-Chem Corporation
Zionsville, Indiana

This letter confirms the inspection of the Enviro-Chem Corporation barrel storage facility May 13, 1981. This inspection was conducted by Messrs Lee Langlotz and Tom Fitch, Solid Waste Section, Indiana State Board of Health. They were accompanied by Misses Greta Hawvermale and Kathy Simonson of the Boone County Health Department. Your company was represented by Mr. David M. Finton.

The inspection was conducted to review progress made in eliminating violations noted as a result of an April 22, 1981, inspection of the barrel storage facility.

The number of leaking containers is decreasing, but it was noted that there are still leaking containers at this site. There are still a number of "popped top" barrels on site. Access between rows of barrels is improving, but there are still rows that are inaccessible. The operating record for weekly inspection of the barrel storage facility has been reinstituted. Water still is ponded on the south end of the barrel storage facility. Mr. Finton related that the water portion would be pumped into one of the cooling ponds. The solvent and oil portion will be skimmed off and used in the "fuels program".

Sincerely,

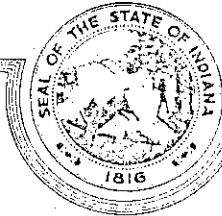

Ralph C. Pickard
Technical Secretary

TFitch/jb

cc: Steve Zlatos - Attorney Generals Office
Richard Shandross, U.S. EPA, Region V
Greta Hawvermale
Boone County Health Department

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS 46206

1330 West Michigan Street
(317) 633-4420

May 8, 1981

VIA CERTIFIED MAIL

Mr. Roy Strong, President
Enviro-Chem Corporation
865 South U.S. 421
Zionsville, IN 46077

Dear Mr. Strong:

Re: Inspection of the Barrel Storage Facility
Enviro-Chem Corporation - Zionsville
April 29, 1981

This letter confirms the inspection of the barrel storage facility conducted April 29, 1981. This inspection was conducted by Mr. Tom Fitch, Facility Inspector, Solid Waste Management Section, Division of Sanitary Engineering. He was accompanied by Mr. Tony Clark of Enviro-Chem Corporation and Greta Hawvermale and Kathy Simonson of the Boone County Health Department.

Mr. Fitch sampled a drainage ditch on the west side of the processing area, as well as the ponded water on the south end of the barrel storage facility. The drainage ditch is located at the bottom of the earth dike for the cooling pond near the permanent storage tanks. These samples will be tested for TOC, volatiles, primary pollutants, oil and grease, and phenols.

Pictures of leaky barrels, popped top barrels, the drainage ditch, the ponded water in the storage facility, corroded barrels, punctured barrels, and poor access aiseways within the storage facility were taken. This was to document findings made on April 28, 1981, by Messrs. Lee Langlotz and Tom Fitch.

It was noted on April 28, 1981, that work had been initiated to process leaky barrels of waste.

Sincerely,

Ralph C. Pickard
Technical Secretary

TF/mjh

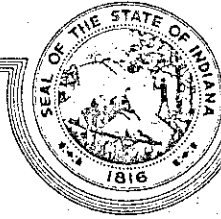
cc: Steve Zlatos, Attorney General's Office
Richard Shandross, U.S. EPA ✓
Boone County Health Department

RECEIVED
MAY 11 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

7ate NOV

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS 46206

May 7, 1981

VIA CERTIFIED MAIL

Mr. Roy Strong, President
Enviro-Chem Corporation
865 South U.S. 421
Zionsville, IN 46077

Dear Mr. Strong:

Re: Inspection Conducted April 28, 1981
Enviro-Chem Corporation Barrel
Storage Facility

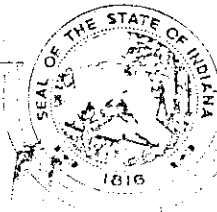
This letter confirms the inspection conducted April 28, 1981, at the Enviro-Chem Corporation Barrel Storage Facility. The inspection was conducted by Messrs. Lee Langlotz and Tom Fitch, Facility Inspectors, Solid Waste Management Section, Division of Sanitary Engineering. They were accompanied by you and Messrs. Tony Clark and John Grimm representing Enviro-Chem Corporation. During that inspection, several violations of the Environmental Management Act were noted in that the condition of the storage area represented a potential threat to the environment. It should also be noted that the conditions noted are violation of the regulations promulgated pursuant to the Resource Conservation Recovery Act. The following conditions were observed:

1. It was noted that there were containers in the barrel storage facility which were leaking hazardous wastes. This is in violation of 40 CFR, Section 265.171, "Condition of Containers." The waste in these barrels shall be managed so that there is no further leaking of these hazardous wastes into the environment.
2. It was noted that there were containers with popped tops. This may indicate that the waste in these containers is reacting and giving off vapors causing the tops to pop. This may jeopardize the integrity of these containers. This is a violation of 40 CFR, Section 265.172, "Compatibility of waste with container." The waste within these barrels shall be removed to minimize the chance that these containers will begin to leak wastes.
3. At this time, there is no weekly inspection schedule for the barrel storage facilities outlined in 40 CFR, Section 265.174, "Inspections of the barrel storage facility will be conducted on at least a weekly basis to note any deterioration or leaks of containers."

1330 West Michigan Street
Indianapolis, IN 46206-4420
RECEIVED
MAY 11 1981
WASTE MANAGEMENT BRANCH
EPA REGION V

STATE OF INDIANA

ENVIRONMENTAL MANAGEMENT BOARD



INDIANAPOLIS 46206

1330 West Michigan Street
(317) 633-1420

VIA CERTIFIED MAIL

Mr. Roy Strong, President
Enviro-Chem Corporation
865 South U.S. 421
Zionsville, IN 46077

RECEIVED

MAY 14 1981

MAY 18 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

Dear Mr. Strong:

Re: Inspection of Enviro-Chem
Corporation's Barrel Storage Facility
May 5, 1981

This letter will confirm the May 5, 1981, inspection of the Enviro-Chem Corporation barrel storage facility. The inspection was conducted by Mr. Tom Fitch, Facility Inspector for the Solid Waste Management Section of the Division of Sanitary Engineering. He was accompanied during this inspection by Mr. John Grimm and yourself, representing the Enviro-Chem Corporation.

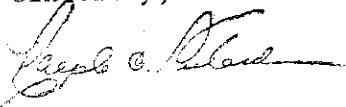
Mr. Fitch noted that some improvement had been made since his previous inspection on April 29, 1981.

Some of the barrels leaking hazardous waste have been pumped of their contents and removed from the facility. There were still a number of barrels present which were leaking hazardous waste. There are still many barrels with popped tops, corroded tops, and barrels with broken seals.

There was ponded surface water on the south end of the barrel storage facility. This water has a light sheen on it which indicates the presence of contaminants. This area is to be pumped dry and the water treated as a hazardous waste if it is determined to be so.

A weekly inspection of this facility by Enviro-Chem Corporation personnel was to be made with a log of that inspection kept. This has not been initiated yet.

Sincerely,


Ralph C. Pickard
Technical Secretary

TFitch/mjh

cc: Mr. Steve Zlatos, Attorney
General's Office

✓ Mr. Richard Shandross - U.S. EPA

Ms. Greta Hawvermale, Boone County
Health Department



ENVIRO-CHEM CORPORATION

865 South US 421

Zionsville, Indiana 46077

(317) 769-6153

May 15, 1981

RECEIVED

MAY 18 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

United States Environmental Protection Agency
Region V
Solid Waste Management Section
Hazardous Waste Division
230 S. Dearborn
Chicago, Illinois 60604

ATTN: Rich Shandross

RE: Chemical and Physical Stabilization of Still Bottoms and Drums
and Tank Bottoms at Enviro-Chem Corporation

Dear Mr. Shandross:

We have recently decided that the wastes that we generate from our facility must be chemically and physically stabilized so that a more consistent waste can be generated from our facility. We have been experimenting with a lime and fly ash stabilization technique on a laboratory scale basis. We are now ready to attempt to do this same process on a larger scale.

On Friday afternoon, May 15, 1981, we made a telephone call to the technical division of the USEPA Headquarters and discussed this project with Jan Jablonski. We were specifically interested in finding out what our obligations under the RCRA program would be concerning this project. We described the process to her and she indicated that there were no provisions for the chemical treatment from generators of hazardous waste under the RCRA program. She did indicate that the waste would have to be characterized after the stabilization process. Enclosed please find the laboratory analysis of materials that have gone through this process.

We are considering this project as part of our in-line treatment of our waste and therefore, no additional permits or notification should be required. We do not intend to use this process for wastes other than our own.

Please advise if you do not agree with our process on this material. We thank you for your time and consideration.

Sincerely,

David M. Finton
Vice President



ENVIRO-CHEM CORPORATION

865 South US 421

Zionsville, Indiana 46077

(317) 769-6153

Copies of the laboratory analysis will be sent under separate
cover.

RECEIVED

REGIONAL ENVIRONMENTAL DIVISION
V. MOIDON, ASST

April 20, 1981
2.

From a public health perspective, I personally remain very much concerned for our environmental future. Unfortunately, waiting until gross contamination of the water supply occurs will only lead to reruns of Love Canal, Seymour, Indiana, and numerous other such sites with the attendant health ramifications and tremendous clean up costs involved.

Again, my sincere thanks.

Sincerely,



Douglas F. Johnstone, M.D.

DFJ/ct
TLI

cc: United States Environmental Protection Agency
Region Five Office
Solid Waste Program
230 South Dearborn Street
Chicago, Illinois 60604

cc: Mr. Walter Kinnard
Bloor Lane Road
Zionsville, Indiana 46077

April 20, 1981

Attorney General Linley E. Pearson
Room 219 State House
Indianapolis, Indiana 46204

Dear Mr. Pearson:

Thank you for your efforts in bringing out the facts surrounding the illegal practices that have prevailed for so long at the Enviro Chem Corporation and associated Northside Landfill.

The owner of this business has repeatedly demonstrated his willingness and ability to avoid obeying existing rules and regulations.

Those of us who have objected to the continued use of this site for toxic waste disposal have done so for a number of reasons, including the poor suitability of the site and attendant environmental risks, what appears to be very inadequate enforcement capabilities in monitoring practices by the Indiana State Board of Health, and what to at least some of us is perceived as a very short sighted approach by the Board of Health in attempting to define what constitutes safe practice.

Few would argue as to the need for hazardous and toxic waste disposal sites. However, a geographically poor site situated directly on a tributary to a creek serving a large population base coupled with a management that shows little regard for existing law, workers' safety, or the environment, creates a situation wherein further serious problems cannot help but occur.

Again, I appreciate your efforts in verifying what many of us have suspected for sometime has gone on at this site.

I hope you will be rewarded by cooperative efforts on behalf of the Boone County Prosecutors office in your pursuit of an appropriate settlement or judgement in this matter.



ENVIRO-CHEM CORPORATION

865 South US 421
Zionsville, Indiana 46077
(317) 769-6153

April 2, 1981

Mr. Carl J. Klepitsch, Jr., Chief
Waste Management Branch
Environmental Protection Agency
230 S. Dearborn
Chicago, Illinois 60604

RECEIVED
APR 8 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

RE: Response to Inspection by USEPA Personnel on March 4, 1981 at the
Enviro-Chem Corporation Facility, Zionsville, Indiana

Dear Mr. Klepitsch:

We have carefully reviewed the inspection report that we received on March 30, 1981 of the above referenced inspection performed by Rich Shandross and Tom Golz of your office. We wish to thank you for sending us a copy of the inspection report since it gives us an opportunity to know our shortcomings as related to the new RCRA regulations.

There were some points made in the inspection report that we wish to address. The following is a point by point response in the same order that they appear in the inspection report.

1. It was stated that there were no employee training records. Several training courses have been given to our staff and have been documented and put in the employee's personnel records. The most recent of which was training in the use of "Scot Paks" self-contained respirators, on Monday, March 30, 1981. There have also been training courses in fire fighting, eye protection, chemicals handled in our facility, CPR training, emergency response training, etc.

2. It was noted in the report that we did not have internal communications or an alarm system. We have an internal system that gives us direct contact from the office to the plant. If the plant manager is not near his telephone, he can be reached by a CB radio. Alarm systems, such as fire alarms and spill alarms have not been installed to this date, but will be installed in the near future.

3. Aisles between stacks of drums have now been cleared and a program has been instituted to continue to improve the drum storage section. Specifically, the number of drums stored has already been drastically reduced since the inspection.

4. Arrangements have been made to provide local authorities with our emergency response plan and to inform them of their role in this plan. It is our opinion that since this is a very specialized business, we need to do more than simply give them a written plan. We must also train them in how to deal with an emergency at a hazardous waste storage facility.

5. It was noted in the inspection that there was no formal distinction of who the primary, secondary, etc., personnel were that would be contacted in case of an emergency to coordinate remedial actions. This is not the case. This information is available in our contingency plan and the people who are involved in emergency response coordination know who they are and whether they are primary or secondary coordinators.

6. As we indicated in item 4, our contingency plan is being presented to local authorities and emergency response organizations. This will be completed within the next 30 days.

7. New columns in our operating records are being added to list hazardous waste numbers in accordance with sub-part D, "Lists of Hazardous Waste" of the May 19, 1980, Federal Register. We will also identify volumes of material in storage by gallons and identify density of materials in accordance with the requirements of RCRA.

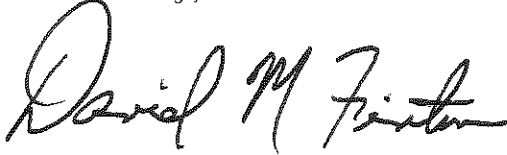
8. We are presently going through a complete housekeeping of our drum storage area. We are concentrating on processing drums that are in poor condition. Any drum that is taken off a truck that is not properly sealed will be emptied immediately or put into an over-pack container. This should not be a common situation since our drivers are instructed not to allow drums in poor condition to be loaded on to their trucks. We take exception to a statement made in the inspection report relative to incompatible wastes being stored at Enviro-Chem Corporation. We have made it a policy to separate any acids or caustics that may be brought into the facility, and during the time of the inspection, no corrosive materials were in the immediate drum storage area.

9. Please find attached a diagram that shows tank location and diameters as requested during the time of the inspection.

10. There was a comment made on the back of the last page of the inspection report relative to Mr. Strong's signing our Part A Application without being totally familiar with the contents. This is no different than one of your inspectors having you sign a letter concerning their work without your direct contact with the subject in question. The management staff that was involved in preparing the Enviro-Chem Part A Application are very capable in their field. Mr. Strong was confident that the application had been properly prepared when he signed it.

We hope that we can continue to work with you and your staff in a cooperative manner to make Enviro-Chem Corporation the type of facility that is needed in order for the Resource Conservation and Recovery Act to work. Thank you again for supplying us with a copy of this inspection report.

Sincerely,

A handwritten signature in black ink, reading "David M. Finton". The signature is written in a cursive style with a large, looping "D" and "F".

David M. Finton
Vice President

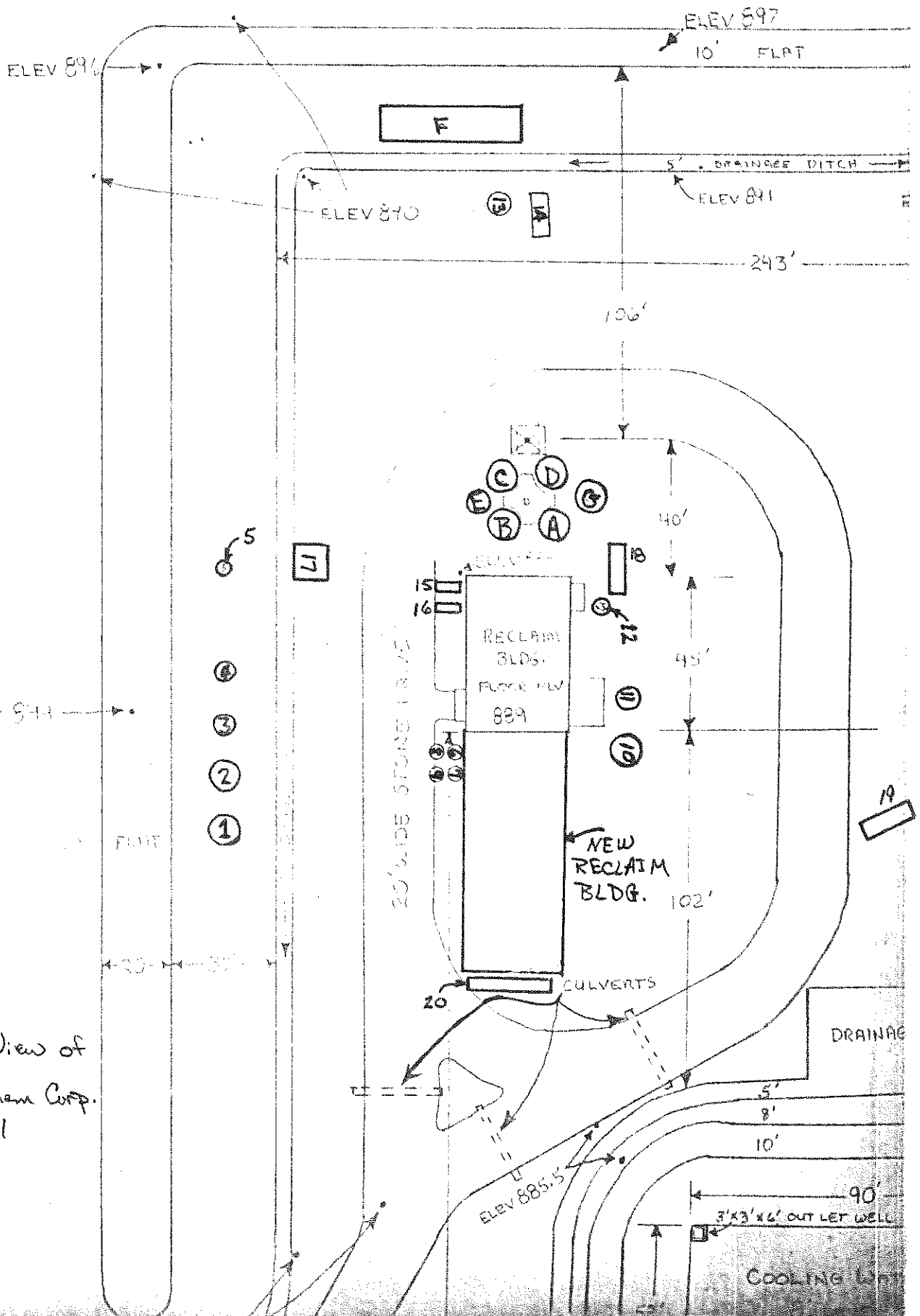
DMF:bjh

Enviro - Chem Corporation

Bulk Tank Inventory

Tank ID	Purpose	Volume (gal)	Diameter (ft)	Height (ft)
A	Oil Processing	10,500	10.5	15.5
B	Solvent Still	10,500	10.5	15.5
C	Solvent Storage	10,500	10.5	15.5
D	Oil Storage	10,500	10.5	15.5
E	Solvent Coalescer	5,000	8.0	12.0
F	Fuel Oil Product Storage	30,000	10.5	31.0
G	Fuel Oil Product Storage	13,000	12.0	30.0
1	Waste Solvent & Oil Storage	10,500	10.5	15.5
2	Waste Solvent & Oil Storage	10,500	10.5	15.5
3	Waste Solvent & Oil Storage	5,000	8.0	12.0
4	Waste Solvent & Oil Storage	5,000	8.0	12.0
5	Boiler Fuel Oil	2,000	5.0	12.0
6	Clean Solvent Storage	1,500	4.0	12.0
7	Clean Solvent Storage	1,500	4.0	12.0
8	Clean Solvent Storage	20,000	5.0	12.0
9	Clean Solvent Storage	20,000	5.0	12.0
10	Still Bottom Storage	15,000	10.0	24.0
11	Waste Solvent Storage	10,000	8.0	21.0
12	Still Bottom Storage	1,500	5.0	12.0
13	Waste Solvent Storage	3,000	8.0	9.5
14	Waste Solvent Storage	4,500	5.3	25.0
15	Solvent Drying Process	1,000	5.0	10.0
16	Solvent Drying Process	1,000	5.0	10.0
17	Fuel Oil Storage	10,000	10.0	16.0
18	Fuel Oil Storage	10,000	8.0	20.0
19	Fuel Oil Storage	10,000	7.5	20.0
20	Fuel Oil Storage	7,500	6.0	30.0

N 87° 38' W - 448.17'



Aerial View of
Enviro-Chem Corp.
4-1-81

MAR 25 1981

SEWME

Anthony Clark, Plant Manager
Enviro-Chem Corporation
865 South U.S. HWY 421
Zionsville, Indiana 46077

RE: Enviro-Chem Corporation
Zionsville, Indiana
IND084259951

Dear Mr. Clark:

Representatives of the United States Environmental Protection Agency
(U.S. EPA) inspected your facility on March 4, 1981. This report is
forwarded for your information.

If you have any questions concerning this inspection report, please con-
tact Ralph Feeney of the Water & Hazardous Materials Compliance Section
at (312) 353-2114.

Very truly yours,

Arnold E. Leder, Chief
Compliance Section
Water & Hazardous Materials
Enforcement Branch

Enclosure

cc: David Lamm, Chief
Solid Waste Management Section
Indiana State Board of Health

bcc: Constantelos/Klepitsch
Shandross
Messenger/Brunet
Feeney

RECEIVED
MAR 20 1981
WASTE MANAGEMENT BRANCH
EPA REGION 4
INDIANAPOLIS

STATE IDENTIFICATION NUMBER
(If Applicable)

ND084259951
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Environ-Chem Corporation
- (b) Street: 865 South ^{U.S.} ^{44th} 421
- (C) City: Zionsville (D) State: IN (E) Zip Code: 46077
- (F) Phone: 317 769 6153 (G) County: Dane
- (H) Operator: Tony Clark - Plant Manager (Designated on Part A Application) (Mike Finton Roy Strong)
- (I) Street: Same as Above
- (J) City: _____ (K) State: _____ (L) Zip Code _____
- (M) Phone: _____ (N) County: _____
- (U) Owner: Mike Finton and Roy Strong
- (P) Street: Same as Above
- (Q) City: _____ (R) State: _____ (S) Zip Code: _____
- (T) Phone: _____ (U) County: _____
- (V) Date of Inspection: 3-4-81 (W) Time of Inspection (From) 2:35 pm (To) _____
- (X) Weather Conditions: Overcast 35° F

(Y) Person(s) Interviewed

Title

Telephone

George Dayhuff

Environmental Consultant

769-6153

Ray Strong

President

"

John Green

Facility Eng.

"

(Z) Inspection Participants

Sales Coordinator
Agency/Title

Telephone

Rich Shandross

USEPA Region IV

(312) 886 4023

Tom Golz

USEPA Region IV

"

Tom Fitch, B.J. Thomas, Tim Kelly

Tim Hunsicker, Pat Allen, Don Benay

Indiana State Police (M) 633 0176

(AA) Preparer Information

Name

Agency/Title

Telephone

Tom Fitch

ISDA / Facilities Inspector

633 0215

Rich Shandross

USEPA / IN SIO

(312) 886 6146

Tom Golz

USEPA / Env. Sci.

(312) 886 4023

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

☒ A. Storage and/or Treatment

1. Containers (I)

2. Tanks (J)

3. Surface Impoundments (K)

4. Waste Piles (L)

☐ D. Incineration and/or Thermal Treatment
(O and P)

☒ E. Chemical, Physical, and Biological
Treatment (Q)

☐ B. Land Treatment (M)

☐ C. Landfills (N)

Note: If facility is also a generator or transporter of hazardous waste complete section IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<u> </u>	<u> </u>	<u>✓</u>	<u>N/A</u>
2. Facility expansion?	<u> </u>	<u> </u>	<u>✓</u>	<u>N/A</u>
(b) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
2. Does the owner or operator have detailed waste analysis plan on file at the facility?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
2. Artificial or natural barrier around facility?	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
3. Controlled entry?	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
4. Danger sign(s) at entrance?	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<u>✓</u>	<u> </u>	<u> </u>	<u>#s 1-3 included in inspection log</u>
2. Records of operator error?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
3. Records of discharges?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

*Not Inspected

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job Titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Job Descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Description of Training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Records of Training?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Have facility personnel received required training by 5-19-81?	N/A			
6. Do new personnel receive required training within six months?	N/A			
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

1. Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

_____ ✓ _____

(B) If required, does the Facility
have the Following Equipment:

1. Internal communications or
alarm systems?
2. Telephone or 2-way Radios
at the scene of operations?
3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

~~NA~~ ✓ _____ ~~NA~~

✓ _____

✓ _____

Indicate the volume of water and/or foam available for fire control:

Units: _____

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the Owner or Operator
established Testing and
Maintenance Procedures
for Emergency Equipment?

✓ _____ *testing of Extinguishers by Personnel
equipment.*

2. Is Emergency Equipment
Maintained in Operable
Conditions?

✓ _____

- (D) Has Owner or Operator Provided
Immediate Access to Internal Alarms
(if needed)?

_____ ✓ _____ *N/A
there is no alarm system presently
they have contacted APT concerning
this matter.*

Not Inspected

(E)

Is there adequate aisle space
for unobstructed movement?

✓

*Aisles, but they were
obstructed in most cases*

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the contingency Plan contain the
following information:

Yes

No

NI*

Remarks

1. The actions facility personnel
must take to comply with
§265.51 and 265.56 in response
to fires, explosions, or any
unplanned release of hazardous
waste? (If the owner has a Spill
Prevention, Control, and Counter-
measures (SPCC) Plan, he needs
only to amend that plan to
incorporate hazardous waste
management provisions that are
sufficient to comply with the
requirements of this Part (as
applicable.)

✓

2. Arrangements agreed to by local
police departments, fire departments
hospitals, contractors, and State
and local emergency response teams
to coordinate emergency services
pursuant to §265.37?

✓*

* (Arrangements have been made
internally. There is nothing on
file)

3. Names, addresses, and phone
numbers (office and home) of all
persons qualified to act as
emergency coordinators?

✓

* * (Emergency tele. nos. but no formal
designation noted as to Primary
Secondary, Emergency Coordinator
Emergency nos.)

4. A list of all emergency equipment
at the facility which includes the
location and physical description
of each item on the list and a
brief outline of its capabilities?

✓

5. An evacuation plan for facility
personnel where there is a possibility
that evacuation could be necessary?
(This plan must describe signal(s)
to be used to begin evacuation,
evacuation routes, and alternate
evacuation routes?)

✓

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

[illegible]

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	_____	_____	_____	_____
2. Are records of past shipments retained for 3 years	_____	_____	N/A	_____
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?	_____	_____	N/A	no discrepancies seen.

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

C Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓ _____

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each wastes treatment, storage, or disposal as required in Appendix I?

_____ ✓ _____

— No. Haz. Waste#
— Has volume in "drums"
— no density.
— Not indicated whether SO₁ or SO₂, but dates of reclamation noted (not by #)

c. The location and quantity of each hazardous waste within the facility?

_____ ✓ _____

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

_____ N/A _____

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

_____ ✓ _____

f. Reports detailing all incidents that required implementation of the contingency plan?

_____ N/A _____

g. All closure and past closure costs as applicable? (Effective 5-19-81)

_____ N/A _____

** See page 33252 of the May 1;9, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

Yes No NI* Remarks

(A) Closure and Post Closure

1. Closure Plan Available for Inspection by May 19, 1981?

2. Has this plan been submitted to the Regional Administrator

3. Has Closure begun?

4. Is closure estimate available by May 19, 1981?

(B) Post Closure Care and Use of Property

Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

①
USE AND MANAGEMENT OF CONTAINERS

Facility Name: EnviroChem Corp.

Date of Inspection: 3/5/81

Yes No NI* Remarks

1. Are containers in good condition?

2. Are containers compatible with waste in them?

3. Are containers stored closed?

4. Are containers managed to prevent leaks?

5. Are containers inspected weekly for leaks and defects?

6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?

Many bent up, puffed up, punctured, leaking, rusted etc.

Apparent incompatibility because of nature of corrosion of drum.

Many had bungs open or no tops

Many areas of leaks, small spills seen.

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	<u>N/A</u>
8. Are containers of incompatible waste separated or protected from sufficient distance?	_____	_____	_____	<u>N/A</u>

(J)
TANKS

Facility Name: Enviro Chem Corp.

Date of Inspection: 3-5-81

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	<u>✓</u>	_____	_____	_____
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	_____	_____	_____	<u>N/A</u>
3. Do continuous feed systems have a waste-feed cutoff?	<u>✓</u>	_____	_____	_____
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	_____	_____	_____	<u>N/A</u>
5. Are required daily and weekly inspections done?	_____	_____	<u>✓</u>	_____
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	<u>✓</u>	_____	_____	_____
7. Are incompatible waste stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	<u>N/A</u>

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 18.0K gallons

Tank diameter: ~~10' dia x 18' h~~ 25 feet *(will send no info)*

Distance of tank from property line 50 feet

(See table 2 - 1 through 2 - 6 of NRPA's "Flammable and Combustible Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

2. Do earthen dikes have protective covers?

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

4. Is the freeboard level inspected at least daily?

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

L

WASTE PILES

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from the wind?	_____	_____	_____	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	_____	_____	_____	_____
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)	_____	_____	_____	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____
5. Are piles of reactive or ignitable waste protected?	_____	_____	_____	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	_____	_____	_____	_____

LAND TREATMENT

Facility Name: _____ Date of Inspection: _____

- | | | | | |
|---|-------|-------|-------|-------|
| 1. Is hazardous waste capable of biological or chemical degradation? | _____ | _____ | _____ | _____ |
| 2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)? | _____ | _____ | _____ | _____ |
| 3. Is waste analysis according to 265.273? | _____ | _____ | _____ | _____ |
| 4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? | _____ | _____ | _____ | _____ |
| 5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? | _____ | _____ | _____ | _____ |
| 6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278? | _____ | _____ | _____ | _____ |
| cation dates and rates, quantities, and location of all hazardous waste placed in the facility? | _____ | _____ | _____ | _____ |
| 8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? | _____ | _____ | _____ | _____ |
| 9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) | _____ | _____ | _____ | _____ |

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements				
Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	_____	_____	_____	_____
**2. Collection of run-off from active portions of the fill?	_____	_____	_____	_____
**3. Is collected run off treated?	_____	_____	_____	_____
4. Control of wind disposal of hazardous waste?	_____	_____	_____	_____
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	_____	_____	_____	_____
2. The contents of each cell and the location of each hazardous waste type within each cell?	_____	_____	_____	_____
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	_____	_____	_____	_____
2. Has this plan been submitted to the Regional Administrator?	_____	_____	_____	_____
3. Has Closure begun?	_____	_____	_____	_____
4. Is Closure cost estimate available by 5-19-81?	_____	_____	_____	_____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(E) Special requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	_____	_____	_____	_____
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	_____	_____	_____	_____
2. Does the landfill have a chemically and physically resistant liner system?	_____	_____	_____	_____
3. Does the landfill have a functional leachate collection system?	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	_____	_____	_____	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?				

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment:): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

	Component	Yes	No	NI*	Remarks
1.	_____	_____	_____	_____	_____
2.	_____	_____	_____	_____	_____
3.	_____	_____	_____	_____	_____
4.	_____	_____	_____	_____	_____
5.	_____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following:	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

Yes No NI* Remarks

2. Documented, written data may be substituted for analysis for these. Are either present for:

a. Lead?

b. Mercury?

B. Other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested for.)

Remarks

1. _____

2. _____

3. _____

4. _____

5. _____

III. Monitoring and Inspections

Yes No NI* Remarks

A. Combustion/emission control instruments monitored at least every 15 minutes

B. Steady state maintained or corrections attempted?

C. Stack Plume observed at least hourly for normal color and opacity?

D. Did any stack observations made by owner or operator show a plume different than normal?**

E. If yes to D above, were corrections made to return emissions to normal appearance?**

F. Complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

G. Emergency shutdown controls, system alarms checked daily for proper operation?

*Not Inspected

**Specify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	_____	_____	_____	_____
2. If this facility open-burns waste explosive, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	_____	_____	_____	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	_____	_____	_____	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutraliz wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the Manifest available for review?	<u>X</u>	_____	_____	_____
(B) Do the Manifest forms reviewed contain the following information: (If possible, make copies of/or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<u>X</u>	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<u>X</u>			

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>X</u>	—	—	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>X</u>	—	—	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	—	—	—	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	—	—	_____
7. Required Certification?	<u>X</u>	—	—	_____
8. Required Signatures?	<u>X</u>	—	—	_____
(C) Does the Owner or Operator Submit Exception Reports when Needed?	<u>X</u>	—	—	<u>None submitted to date</u>

(2.) PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off site)	—	—	<u>✓</u>	_____
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials? (Required to movement of hazardous waste off site)	—	—	<u>✓</u>	_____
(C) If required, are placards available to transfer?	—	—	<u>✓</u>	_____

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

~~3.~~ On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	—	—	N/A	—
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days	—	—	—	—
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	—	—	—	—
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	—	—	—	—
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	—	—	—	—
c. Do continuous feed systems have a waste-feed cutoff?	—	—	—	—
d. Are required daily and weekly inspections done?	—	—	—	—
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?)	—	—	—	—
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	—	—	—	—

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<u>X</u>	___	___	_____
(B) Has the Generator submitted Annual Reports and Exception Reports as required? <i>Or</i>	<u>Yes</u>	<u>N/A</u>	___	<i>No annual rept reqd No date limit for Exception rept</i>

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

(A) Has the installation imported or exported Hazardous Waste?	<u>Yes</u>	<u>X</u>	___	_____
--	-----------------------	----------	-----	-------

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:
 - a. Notified the Administrator in writing? _____
 - b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? _____
 - c. Met the Manifest requirements? _____
2. Importing Hazardous Waste, has the generator:
 - a. Met the manifest requirements? _____

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
(A) Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	<u>X</u>	—	—	

II. INTERNATIONAL SHIPMENTS

A. Does the Transporter record on the manifest the date the waste left the U.S.?	—	<u>NA</u>	—	
B. Are signed completed manifest(s) on file?	—	<u>NA</u>	—	

V. MISCELLANEOUS

A. Does Transporter transport hazardous waste into the U.S. from abroad	—	<u>X</u>	—	
B. Does the Transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	—	<u>X</u>	—	

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

Jt Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

1. Note that estimate of drum storage presently exceeded 8000 full drums, but Part A specifies maximum capacity of 7000 (55 gal) drums. They have been shut down recycling-wise for several weeks but have still accepted drums of waste.
2. Roy Strong signed the Part A yet admitted that he was not familiar with the content of it.

IND 084259 951

December 11, 1978

Mr. Roy M. Strong
Enviro-Chem Corporation
R.R. 1, Box 197A
Zionsville, IN 46077

Dear Mr. Strong:

Re: Disposal of Wastewater from
the Oil Reclamation Process at
Enviro-Chem Corporation, Zionsville

This will acknowledge the receipt of your letter dated November 1, 1978, concerning the above-referenced subject.

Approval is hereby granted until May 1, 1979, for disposal of 5,000 gallons per day of wastewater from Enviro-Chem Corporation's oil reclamation process, at the Northside Landfill, Operating No. 6-1, Boone County. The waste is to be mixed with refuse and covered with a minimum of six inches of cover soil by the end of the working day.

This approval is granted subject to the following conditions:

1. That the wastewater from the oil reclamation process not exceed 5% oil.
2. That Enviro-Chem Corporation draw from the oil separation lagoon at the Northside Landfill a volume of liquid equal to the volume of wastewater disposed of with the refuse at the Northside Landfill.
3. That the volume of wastewater into the refuse and the volume of liquid out of the oil separation lagoon appear on Enviro-Chem Corporation's Regulation SPC-17 hauling report.

This approval will be revoked if the landfill fails to maintain compliance with Regulation SPC-18. Any necessary local approval must be obtained from the Boone County Health Department. The waste must be hauled in accordance with Regulation SPC-17.

Mr. Roy M. Strong

-2-

December 5, 1978

If you have any questions, please contact Mr. Eggleston at
317/633-0176.

Very truly yours,

Oral H. Hert
Technical Secretary

JMEggleston/ds

cc: Northside Landfill
Boone County Health Department

bcc: Jim Hunt
George Oliver

ds 11/30 R7

STATE IDENTIFICATION NUMBER
(If Applicable)

EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Environmental Conservation and Chemical Corporation (Enviro-Chem Corp)
(B) Street: 865 South US 421
(C) City: Zionsville (D) State: Indiana (E) Zip Code: 46077
(F) Phone: 317 769-6153 (G) County: Boone
(H) Operator: _____
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: _____
(P) Street: _____
(Q) City: _____ (R) State: _____ (S) Zip Code: _____
(T) Phone: _____ (U) County: _____
(V) Date of Inspection: _____ (W) Time of Inspection (From) _____ (To) _____
(X) Weather Conditions: _____

MAR 19 9 42 AM '81
EPA/RCRA/STANDARD
STATE DEPT. OF HEALTH

Rev. 3-6-81/J.B.

(Y)	Person(s) Interviewed	Title	Telephone
	<u>Mr. Ray Strong</u>	<u>President</u>	<u>(317) 769 6153</u>
	<u>Mr. Jim Wessel</u>	<u>General Manager</u>	<u>Same</u>
	<u>Mr. John Grimm</u>	<u>Env. and Safety mgr</u>	<u>Same</u>
(Z)	Inspection Participants	Agency/Title	Telephone
	<u>J. Thomas Fitch</u>	<u>ISBH / Sanitarian III</u>	<u>(317) 633-0215</u>
	_____	_____	_____
	_____	_____	_____
(AA)	Preparer Information		
	Name	Agency/Title	Telephone
	<u>J. Thomas Fitch</u>	<u>ISBH / Sanitarian III</u>	<u>(317) 633-0215</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|--|--|
| <p><input checked="" type="checkbox"/> A. <u>Storage</u> and/or Treatment</p> <p style="margin-left: 20px;">① Containers (I)</p> <p style="margin-left: 20px;">② Tanks (J)</p> <p style="margin-left: 20px;">3. Surface Impoundments (K)</p> <p style="margin-left: 20px;">4. Waste Piles (L)</p> <p><input type="checkbox"/> B. Land Treatment (M)</p> <p><input type="checkbox"/> C. Landfills (N)</p> | <p><input type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P)</p> <p><input type="checkbox"/> E. Chemical, Physical, and Biological Treatment (Q)</p> |
|--|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	✓	—	_____
2. Facility expansion?	—	✓	—	_____
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	<i>Storage</i> For the purpose of recycling / Reclamation the Analysis are deemed to be adequate
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	_____
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	✓	—	—	_____
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	<i>There is Always someone on site 24 hours - 1 24 hour operation</i>
2. Artificial or natural barrier around facility?	✓	—	—	<i>There is a 4 ft fence around the facility</i>
3. Controlled entry?	✓	—	—	<i>There are 2 gates for entry on site</i>
4. Danger sign(s) at entrance?	✓	—	—	_____
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	—	✓	—	_____
2. Records of operator error?	—	✓	—	_____
3. Records of discharges?	—	✓	—	<i>No discharges off site since 11-19-88</i>

*Not Inspected

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Inspection schedule but not documented AS Needed
5. Safety, emergency equipment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	-----
6. Security devices?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	-----
7. Operating and structural devices?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	-----
8. Inspection log?	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There are inspection logs but inspections are not well documented
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
3. Description of training?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	For management personnel not hourly workers.
4. Records of training?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	" " " "
5. Have facility personnel received required training by 5-19-81?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no way to tell
6. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	" " " " " "
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
2. No smoking signs?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Should be posted throughout facility
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

☒ ☐ ☐ Spills on-site (contained)

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

☒ ☐ ☐ _____

2. Telephone or 2-way radios
at the scene of operations?

☒ ☐ ☐ _____

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

☒ ☐ ☐ _____

Indicate the volume of water and/or foam available for fire control:

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

☐ ☒ ☐ could not be found

2. Is emergency equipment
maintained in operable
conditions?

☒ ☐ ☐ appears to be in operable condition

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

☒ ☐ ☐ _____

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement? ✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

✓

✓

✓

✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

*Not Inspected

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

— ✓ —

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

✓ — —

- c. The location and quantity of each hazardous waste within the facility?

✓ — —

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — —

N/A

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓ — —

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

— — ✓

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

— — ✓

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	—	—	✓	_____
2. Has this plan been submitted to the Regional Administrator	—	—	✓	_____
3. Has closure begun?	—	—	✓	_____
4. Is closure estimate available by May 19, 1981?	—	—	✓	_____
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	—	—	—	_____

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Environmental Conservation and Chemical Corp Date of Inspection: November 1981

	Yes	No	NI*	Remarks
1. Are containers in good condition?	—	✓	—	_____
2. Are containers compatible with waste in them?	—	✓	—	<u>chlorinated oil / crowding barrels</u>
3. Are containers stored closed?	—	✓	—	_____
4. Are containers managed to prevent leaks?	—	✓	—	_____
5. Are containers inspected weekly for leaks and defects?	—	✓	—	_____
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	✓	—	—	_____

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A

J
TANKS

Facility Name: Environmental Conservation Chemical Corp

Date of Inspection: November '81

- Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? ☒
- Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? ☐ ☒ N/A
- Do continuous feed systems have a waste-feed cutoff? ☐ ☒ N/A
- Are waste analyses done before the tanks are used to store a substantially different waste than before? ☐ ☒ N/A
- Are required daily and weekly inspections done? ☐ ☒
- Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) ☒ ☐ ignitable waste
- Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) ☐ ☒ N/A

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: ? gallons

Tank diameter: ? feet

Distance of tank from property line 75 feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

2. Do earthen dikes have protective covers?

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

4. Is the freeboard level inspected at least daily?

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

WASTE PILES

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	-----
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	-----
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

M

LAND TREATMENT

Facility Name: _____

Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation?

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

3. Is waste analyzed according to 265.273?

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements				
Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	-----
**2. Collection of run-off from active portions of the fill?	---	---	---	-----
**3. Is collected run off treated?	---	---	---	-----
4. Control of wind dispersal of hazardous waste?	---	---	---	-----
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	-----
2. The contents of each cell and the location of each hazardous waste type within each cell?	---	---	---	-----
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	-----
2. Has this plan been submitted to the Regional Administrator?	---	---	---	-----
3. Has closure begun?	---	---	---	-----
4. Is closure cost estimate available by 5-19-81?	---	---	---	-----
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?				
	---	---	---	-----

Yes No NI* Remarks

(If waste is rendered non-reactive or non-ignitable see treatment requirements)

If not, the provisions of 40 CFR 265.17(b) apply.

(E) Special Requirements for Incompatible Wastes.

Does the owner or operator dispose of incompatible wastes in separate cells?

If not, the provisions of 40 CFR 265.17(b) apply.

(F) Special requirements for liquid waste (effective 11-19-81)

1. Are bulk or non-containerized liquids placed in the landfill?

2. Does the landfill have a chemically and physically resistant liner system?

3. Does the landfill have a functional leachate collection system?

4. Are free liquids stabilized prior to or immediately after placement in the landfill?

(G) Special requirements for Containers (effective 11-19-81)

Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	_____	_____	_____	_____
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	_____	_____	_____	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others		
0 to 100.....	204 m	670	ft
101 to 1,000.....	380 m	1,250	ft
1,001 to 10,000.....	530 m	1,730	ft
10,001 to 30,000.....	690 m	2,260	ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	_____	_____	_____	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	_____	_____	_____	_____

*Not Inspected

Yes No NI* Remarks

2. Has documented or written data been substituted for analysis of either:

a. Lead?

b. Mercury?

B. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

Remarks

1. _____

2. _____

3. _____

4. _____

5. _____

III. Monitoring and Inspections

Yes No NI* Remarks

A. Are combustion/emission control instruments monitored at least every 15 minutes?

B. Is steady state maintained or corrections attempted?

C. Is stack plume observed at least hourly for normal color and opacity?

D. Did any stack observations made by owner or operator show a plume different than normal?**

E. If yes to D above, were corrections made to return emissions to normal appearance?**

F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

G. Are emergency shutdown controls and system alarms checked daily for proper operation?

*Not Inspected

**Specify in Remarks for what period of time this was checked.

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	_____	_____	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	_____	_____	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>N/A</u>

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>N/A</u>
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>N/A</u>
(C) If required, are placards available to transporters of hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>not required</u>

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	_____	_____	_____	_____
--	-------	-------	-------	-------

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:
 - a. Notified the Administrator in writing? _____
 - b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? _____
 - c. Met the Manifest requirements? _____
2. Importing Hazardous Waste, has the generator:

Met the manifest requirements? _____

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	_____	_____	_____	_____

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	_____	_____	_____	_____
B. Are signed completed manifest(s) on file?	_____	_____	_____	_____

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	_____	_____	_____	_____
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	_____	_____	_____	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

- 3-4-81 U.S. EPA and ISBH perform RCRA Interim Status Standard (ISS) inspection at ECC. Environmental and administrative violations found. Capacity exceeded and open, leaking barrels in poor condition.
- 3-5-81 U.S. EPA and ISBH inspect Northside for compliance with 2-2-81 U.S. EPA Compliance Order. (Administrative violations.) Compliance not yet achieved
- 4-28-81 ISBH inspects ECC.* Environmental and administrative problems found. (May 7, 1981)
- 4-29-81 ISBH inspects ECC. Drainage ditch on west side sampled. Site photographed. (May 8, 1981)
- 5-5-81 ISBH inspects ECC. Improvements: some leakers removed. Problem with standing water contamination (May 14, 1981)
- 5-13-81 ISBH inspects ECC. Improvements: some leakers removed, aisle space increased. (June 1, 1981)
- 5-21-81 ISBH inspects ECC. Improvements: some leakers removed, some "popped top" removed. Standing water getting deeper. (June 18, 1981)
- 5-29-81 ISBH inspects ECC. Same improvements as 5-21-81, plus aisle space improvement. Oil spill on-site^W found. (June 24, 1981)
- 6-12-81 ISBH inspects ECC. Improvements: leakers gone, "popped tops" nearly gone. Problems with aisle space, oil spill and standing water remain. (July 6, 1981)
- 6-25-81 ISBH inspects ECC. Improvements: ^{contaminated} standing water being recycled. More "popped top" containers (July 16, 1981)
- ~~7-8-81 ISBH inspects ECC. Problem with ECC sending liquids to a landfill,~~

* The following inspections by ISBH are followups to the problems uncovered on 3-4-81 and thereafter. Each inspection was followed up in writing on the date in parentheses, these letters comprise notices of violations and letters of warning (NOVs and LOVs)

~~odor problem, inventory of waste increasing, storage outside of storage area, standing water, leakers, etc. (Aug 6, 1981)~~

7-1-81

Agreed Order against Northside signed. Prohibits taking of waste from ECC or out of State and fines Northside \$500.

7-17-81

Agreed Order is made Final by the Environmental Management Board (EMB).

7-23-81

ISBH inspects ECC. Problem with ECC sending liquids to a landfill, Odor problems, increasing waste inventory, storage outside facility boundary, standing water, leakers, etc (Aug 6, 1981)

7-30-81

ISBH inspects ECC to review compliance with Consent Decree. No improvements (Aug 20, 1981)

8-7-81

ISBH inspects ECC. Waste inventory problem critical due to crowding, aisle space etc. (Sept 4, 1981)

8-13-81

ISBH letter to ECC warning that liquids should not be sent to Four County Landfill.

8-21-81

ISBH inspects ECC. Continued inventory problems. (Sept 10, 1981)

8-28-81

ISBH inspects ECC. Barrel storage environmental problems reiterated. (Sept 16, 1981)

8-31-81

ISBH letter to ECC warning them not to send liquid waste to Four County Landfill.

9-4-81

ISBH inspects ECC. Drum storage inventory extreme, causing back-up of incoming loads off-site. Contaminated water overflow to ditch. plus leakers, spills, "popped tops", corroded drums. Ditch water samples taken. (Sept 21, 1981)

9-15-81

ISBH inspects ECC ^{some} surface water drained ^{and} concrete pad construction begun. Environmental problems continue (Sept 23 1981 - also is a denial to dispose hazardous waste at Northside)

- Concrete temporarily
- 9-25-81 ISBH inspects ECC. Pad in progress. ~~the~~ Approval to store outside facility boundary granted, with conditions. (Oct 8, 1981)
- 9-29-81 } ISBH inspects ECC. More ~~than~~ than 20,000 barrel stored.
- 10-2-81 } (Oct 19, 1981)
- 10-6-81 ISBH inspects ECC. Samples of contaminated soil on-site taken by ISBH (Oct 20, 1981)
- 10-14-81 } ISBH inspects ECC. Pad construction in progress. Company informed
- 10-16-81 } to process problem drums (leaking, corroded, etc) first (Oct 27, 1981).
- 10-21-81 } ISBH inspects ECC. Containers of waste stored off-site in trailer.
- 10-23-81 } Conditions for "outside" storage violated. Contaminated soils found ignitable (sic). Neglected spills were found. (Nov 2, 1981)
- 10-27-81 } ISBH inspects ECC. (Nov 9, 1981)
- 10-30-81 } and personnel recordkeeping
- 11-6-81 ISBH inspects ECC. Waste analysis, procedures reviewed, little environmental improvement (some off-site wastes diked) (Nov 13, 1981).
- 11-17-81 ISBH inspects ECC. Administrative (265.33) and environmental violations found. (Dec 1, 1981)
- 11-24-81 } ISBH inspects ECC. Barrel count = 23,171. Leakers, "popped top",
- 12-1-81 } damaged, open and off-site barrels total 243. (Dec 7, 1981)
- 11-?-81 ISBH does complete ISS inspection of ECC: administrative and environmental violations found (total of 19); Consent Decree deadlines except for removal of contaminated sludge/soil and cooling pond 'security'. (Dec 10, 1981)
- 12-8-81 ISBH inspects ECC. No progress, plus more standing contaminated water and more open containers. (Dec 23, 1981)
- 12-15-81 ISBH inspects ECC. Improvements: spills cleaned up, reduction in number of open containers. (Dec 31, 1981)

- 12-31-81 ISBH inspects ECC. Subsequent letter notifies ECC that approval to use Four County Landfill may be revoked due to manifest discrepancy (type of waste listed incorrectly) (Jan 8, 1982)
- 1-12-82 Letter from ISBH to ECC clarifying that contaminated sludge and soil is hazardous waste since it contains waste listed in 40 CFR 261, Subpart D.
- 1-25-82 } ISBH inspects ECC. Problems: contaminated sludge and soil not removed,
1-28-82 } ~~manipulated~~ 17,000 containers not on concrete pad, waste analysis plan not being followed, inventory procedure not followed, cooling tower not built, (foregoing part of Consent Decree - Noll orders ECC to provide explanation to ISBH, EMB and Attorney General), waste inventory over 26,000 containers, 15 of 19 ISS standards still in violation (administrative and environmental). (Feb 10, 1982)
- 3-9-82 ISBH inspects ECC as followup to Feb 10 letter. Improvement: cooling tower just built, inspections being performed, correction of administrative ISS violations. (April 8, 1982) (only).
- 3-18-82 ISBH inspects ECC (barrel inventory). Total = 24,000. (April 15, 1982)
- 4-1-82 ISBH inspects ECC. Improvements: waste inventory completed, cooling pond water being analyzed. Problems: contaminated precipitation ubiquitous, small oil spill

**D. Corrective
Action**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: May 29, 1980

SUBJECT: Report on a trip to Enviro-Chem Corporation, and Northside Sanitary Landfill, Zionville, IN, on 5/20/1980

FROM: George H. Madany *G.H.M.*
OHM Coordinator

TO: Charles G. Castle, Acting Chief
Environmental Emergency Section

Purpose: To investigate if Enviro-Chem Corp. or Northside Sanitary Landfill are in violation of The Clean Water Act of 1977 (CWA) P.L. 95-217 Section 311.

Previous Investigations: Messers R. Shandross and R. Karl of HWMS, visited the site on March 12, 1980 and March 14, 1980. A report dated March 26, 1980 was submitted by Mr. Shandross to Mr. J. S. Goldstein.

Messers P. Olsen, R. Shandross, E. Morterson, and R. Lillith visited the site on April 10, 1980. Mr. Olsen submitted a report dated April 23, 1980 to the Enforcement Div. files.

Investigation: Information contained in Messers Shandross's and Olsen's reports will not be repeated in the following narrative.

On May 20, 1980 at about 11:00a.m., I met with Messers Ray M. Strong, President, Mike Finton, Vice President, and George Dayhuff, Director of Safety and Environmental Compliance of Enviro-Chem Corporation. They reviewed the operation of the plant, the facilities that they have, and the plans that were underway to have a safe and environmentally acceptable operation. They indicated that they were anxious to comply with recommendations that the EPA might have.

They indicated that the drain pipe that was in the dike around their drum storage area, had been removed. The dike on the north side of the storage area has been raised to 3 feet high and they plan to increase its height to 5 feet. The dike on the south side of the storage area was raised to 5 feet high, and plan to increase its height to six feet. The dike is 12 feet wide and is made of compacted clay dirt. Its permeability is supposedly 10^{-7} cm/sec. When the dike is built up as planned, gravel is going to be spread on its top, so that a fire truck could drive at its top if necessary. The dike is supposed to withstand a 5" rain or more, that is equivalent to a 100 year flood experience. They were preparing to let bids for a security fence and gates around the diked area.

They were also considering either building a roof over the storage area, or constructing a water treatment plant. The comparative cost of these two projects was to be the deciding factor. They said that they had let out bids for a hydrology study of their plant site.

I toured the area and verified what they had related to me. The drain pipe was removed, and the dikes were built up. There was nothing leaking out of their storage area or their plant. The unnamed creek nearby was clear and clean. Photographs were taken of the southern dikes. They were told that further recommendations may be forthcoming from EPA. Apparently they had used some distillation bottoms and solvents that they had, as fuel in their boilers. These had some chlorinated substances of about 5-50 ppm. This had alarmed the media, who were investigating this fact. Enviro-Chem then stopped using any solvents that may have chlorinated substances in them, and shifted to fuel oil #2.

At about 1:00p.m. I went to Northside Sanitary Landfill and met Mr. John Bankert the owner-manager. We drove all around the landfill and over it.

The landfill is built up tens of feet above the original land grade. Thus rain water tends to leach through the landfill and get to the stream nearby. No leachate was in evidence when I inspected the area, but a dried brown path indicated where leachate flowed at one time. This was photographed. Mr. Bankert said that a dark colored leachate emanates at the periphery of the landfill. He has not taken hazardous substances into his landfill yet; but would like to be permitted to do so. The landfill is underlaid by about 140 feet of blue clay. The neighbor's wells are about that deep also, but the underground water table lies about 25 feet below the ground surface (original grade).

Mr. Bankert tried to seal the sloping sides of the landfill with blue clay. This was not a workable solution. He has started now digging a ditch around the landfill, leading to a treatment pond. He thus hopes to channel any leachate to the treatment pond.

The landfill had a used oil reservoir pit at one time; but he has disposed of the oil and closed the pit.

cc: L. E. Townsend
P. Olson - Enforcement
R. Shandross - Hazardous Waste Management Section ✓

ENVIROCHEM
Boone County, Indiana

Location and Background

Envirochem (ECC) is an abandoned waste storage and recycling business which recovered solvents and oils from industrial sources. This facility was in operation from August 1977 to May 1982. The site is adjacent to the Northside Sanitary Landfill and occupies approximately 6.5 acres of land on U.S. 421 north of Zionsville.

On-site storage practices resulted in an inventory beyond that needed to maintain recycling operations. On one occasion, this excessive inventory resulted in an overflow of contaminated rainwater from a holding pond into Unnamed Ditch which flows next to the facility. Unnamed Ditch flows into Finley Creek, which in turn flows into Eagle Creek. Numerous drums stored on-site, deteriorated and leaked their contents into the ground. Organic solvents were found in ground water samples taken from on-site wells.

Operations at ECC ceased under a Court Order obtained by the Indiana Environmental Management Board (IEMB) on May 5, 1982. At that time, over 25,000 drums and 1,500,000 gallons of waste remained on-site.

Emergency Action

The U.S. EPA initiated an emergency action in May 1983 to treat contaminated on-site surface water that was threatening the water quality of area streams. In July 1983, a second immediate removal began at ECC to remove approximately 5,000 drums from the site for the purpose of lessening the threat of fire and explosion on-site.

State and federal authorities negotiated a full scale surface cleanup with 246 companies in mid 1983. The cleanup, which began in March and continued through 1984, removed approximately 30,000 drums, 220,000 gallons of bulk tank waste, 5,000 cubic yards of soil and sludge and 5,000,000 gallons of contaminated water.

Remedial Investigation (RI)/Feasibility Study (FS)

ECC was proposed for inclusion on the National Priorities List (NPL) in December 1982 and appeared in the October 1984 update. In December 1983, the U.S. EPA commenced a subsurface RI of the site to identify both specific contaminants posing a hazard to the public health and pathways of contaminant migration off-site. The RI Final Report was made public during a meeting held in Zionsville on May 18, 1986. The results of the RI indicated the presence of both organic and inorganic contaminants at various on-site locations. Contamination was also found in the shallow saturated zone and an underlying sand and gravel aquifer. Organic contamination was also detected in surface water samples from nearby Finley Creek.

In August 1986, IDEM staff completed its review of the Draft ECC Feasibility Study (FS) and submitted comments to the U.S. EPA. The FS contained various alternatives for remediating the site, including ground water collection, excavation and removal of soil, and incineration.

Due to the close proximity of ECC to the Northside Sanitary Landfill (NSL), the U.S. EPA determined that it would be cost effective to remediate both sites with a combined remedy. A Combined Alternative Analysis (CAA) was undertaken which combined elements of the remedial alternatives presented in both the ECC and NSL feasibility studys. The CAA was presented to the public in December 1986. The remedy selected by both the U.S. EPA and the IDEM included a RCRA cap, perimeter leachate collection system, a ground water collection system, on-site treatment of both ground water and leachate and discharge into Finley Creek, and access and deed restrictions.

The U.S. EPA signed the Record of Decision (ROD) for NSL and ECC on September 25, 1987. The ROD contains the U.S. EPA's final decision on the actual remedy selected for the site and concurs with the remedy proposed in the CAA. All the State's applicable, relevant or appropriate requirements (ARARs) pertaining to the site, which included RCRA closure standards, NPDES limits, and Flood Control regulations, have been incorporated into the ROD.

Remedial Action

The U.S. EPA and IDEM have conducted numerous technical meetings with the consultants representing the various groups of potential responsible parties (PRPs) associated with both sites. The meetings afforded all parties the opportunity to discuss the technical basis for selecting the remedy, specific components of the remedy and the PRPs views on appropriate alternative remedies.

Additional on-site investigative work was conducted by the U.S. EPA, IDEM and PRPs associated with ECC after the completion of the RI to identify additional zones of contamination that could be contributing to contamination found in Finley Creek. An area near the confluence of Finley Creek and Unnamed Ditch was found to be highly contaminated with organic solvents.

The PRPs associated with ECC proposed an alternative remedial action plan which addresses the ECC site separately from NSL. The plan proposed using a different technology than that proposed by the U.S. EPA. Both the State and U.S. EPA carefully reviewed the proposal to determine whether it adequately addressed all the concerns associated with the site. After detailed technical discussions, a consent decree requiring the PRPs to implement their remedy was signed between the PRPs, the U.S. EPA and the State in September 1989.

The major components of the remedial action included:

- Soil vapor extraction, concentration destruction
- RCRA Subtitle C cap
- Access restrictions
- Subsurface and surface water monitoring

The Consent Decree is currently being reviewed by the Department of Justice.